Goodrich Corporation Aircraft Interior Products
Permit Number V97-007
August 3, 2004

Table Of Contents

GENERAL PERMIT CONDITIONS:

Permit Conditions
Goodrich Corporation Aircraft Interior Products
V97-007
August 3, 2004

In accordance with Maricopa County Air Pollution Control Rules and Regulations (Rules), Rule 210 § 302.2, all Conditions of this Permit are federally enforceable unless they are identified as being locally enforceable only. However, any Permit Condition identified as locally enforceable only will become federally enforceable if, during the term of this Permit, the underlying requirement becomes a requirement of the Clean Air Act (CAA) or any of the CAA's applicable requirements.

All federally enforceable terms and conditions of this Permit are enforceable by the Administrator of the United States Environmental Protection Agency (Administrator or Administrator of the USEPA hereafter) and citizens under Section 304 of the CAA.

Any cited regulatory paragraphs or section numbers refer to the version of the regulation that was in effect on the first date of public notice of the applicable Permit Condition unless specified otherwise.

GENERAL CONDITIONS:

1. **AIR POLLUTION PROHIBITED:** [County Rule 100 §301] [SIP Rule 3]
The Permittee shall not discharge from any source whatever into the atmosphere regulated air pollutants which exceed in quantity or concentration that specified and allowed in the County or State Implementation Plan (SIP) Rules, the Arizona Administrative Code (AAC) or the Arizona Revised Statutes (ARS), or which cause damage to property or unreasonably interfere with the comfortable enjoyment of life or property of a substantial part of a community, or obscure visibility, or which in any way degrade the quality of the ambient air below the standards established by the Maricopa County Board of Supervisors or the Director of the Arizona Department of Environmental Quality (ADEQ).

2. **CIRCUMVENTION:** [County Rule 100 §104] [40 CFR 60.12] [40 CFR 63.4(b)]
The Permittee shall not build, erect, install, or use any article, machine, equipment, condition, or any contrivance, the use of which, without resulting in a reduction in the total release of regulated air pollutants to the atmosphere, conceals or dilutes an emission which would otherwise constitute a violation of this Permit or any Rule or any emission limitation or standard. The Permittee shall not circumvent the requirements concerning dilution of regulated air pollutants by using more emission openings than is considered normal practice by the industry or activity in question.

3. **CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS:**
[County Rule 100 §401] [County Rule 210 §§301.7, 302.1e(1), 305.1c(1) & 305.1e]
Any application form, report, or compliance certification submitted under the County Rules or these Permit Conditions shall contain certification by a responsible official of truth, accuracy, and completeness of the application form or report as of the time of submittal. This certification and any other certification required under the County Rules or these Permit Conditions shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

4. COMPLIANCE:

A. COMPLIANCE REQUIRED:

1) The Permittee must comply with all conditions of this permit and with all applicable requirements of Arizona air quality statutes and the air quality rules. Compliance with permit terms and conditions does not relieve, modify, or otherwise affect the Permittee's duty to comply with all applicable requirements of Arizona air quality statutes and the Maricopa County Air Pollution Control Regulations. Any permit non-compliance is grounds for enforcement action; for a permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application. Noncompliance with any federally enforceable requirement in this Permit constitutes a violation of the Act. [This Condition is federally enforceable if the condition or requirement itself is federally enforceable and only locally enforceable if the condition or requirement itself is locally enforceable only]

[County Rule 210 §§301.8b(4) & 302.1h(1)]

2) The Permittee shall halt or reduce the permitted activity in order to maintain compliance with applicable requirements of Federal laws, Arizona laws, the County Rules, or other conditions of this Permit.

[County Rule 210 §302.1h(2)]

3) For any major source operating in a nonattainment area for any pollutant(s) for which the source is classified as a major source, the source shall comply with reasonably available control technology (RACT) as defined in County Rule 100.

[County Rule 210 §302.1(h)(6)] [SIP Rule 220 §302.2]

4) For any major source operating in a nonattainment area designated as serious for PM_{10}, for which the source is classified as a major source for PM_{10}, the source shall comply with the best available control technology (BACT), as defined in County Rule 100.

[County Rule 210 §302.1(h)(7)]

B. COMPLIANCE CERTIFICATION REQUIREMENTS: [County Rule 210 §305.1d]

The Permittee shall file an annual compliance certification with the Control Officer and also with the Administrator of the USEPA. The report shall certify compliance with the terms and conditions contained in this Permit, including emission limitations, standards, or work practices. The certification shall be on a form supplied or approved by the Control Officer and shall include each of the following:

1) The identification of each term or condition of the permit that is the basis of the certification;
2) The compliance status;
3) Whether compliance was continuous or intermittent;
4) The method(s) used for determining the compliance status of the source, currently and over the reporting period; and
5) Other facts as the Control Officer may require to determine the compliance status of the source.

The annual certification shall be filed at the same time as the second semiannual monitoring report required by the Specific Condition section of these Permit Conditions and every 12 months thereafter.

C. COMPLIANCE PLAN: [County Rule 210 §305.1g]
Based on the certified information contained in the application for this Permit, the facility is in compliance with all applicable requirements in effect as of the first date of public notice of the proposed conditions for this Permit unless a compliance plan is included in the Specific Conditions section of this Permit. The Permittee shall continue to comply with all applicable requirements and shall meet any applicable requirements that may become effective during the term of this permit on a timely basis. [This Condition is federally enforceable if the applicable requirement itself is federally enforceable and only locally enforceable if the applicable requirement itself is locally enforceable only]

5. CONFIDENTIALITY CLAIMS:

Any records, reports or information obtained from the Permittee under the County Rules or this Permit shall be available to the public, unless the Permittee files a claim of confidentiality in accordance with ARS §49-487(c) which:

A. precisely identifies the information in the permit(s), records, or reports which is considered confidential, and

B. provides sufficient supporting information to allow the Control Officer to evaluate whether such information satisfies the requirements related to trade secrets or, if applicable, how the information, if disclosed, could cause substantial harm to the person's competitive position.
The claim of confidentiality is subject to the determination by the Control Officer as to whether the claim satisfies the claim for trade secrets.

[County Rule 100 §402] [County Rule200 §411]

A claim of confidentiality shall not excuse the Permittee from providing any and all information required or requested by the Control Officer and shall not be a defense for failure to provide such information.

[County Rule 100 §402]

If the Permittee submits information with an application under a claim of confidentiality under ARS §49-487 and County Rule 200, the Permittee shall submit a copy of such information directly to the Administrator of the USEPA.

[County Rule 210 §301.5]

6. CONTINGENT REQUIREMENTS:

NOTE: This Permit Condition covers activities and processes addressed by the CAA which may or may not be present at the facility. This condition is intended to meet the requirements of both Section 504(a) of the 1990 Amendments to the CAA, which requires that Title V permits contain conditions necessary to assure compliance with applicable requirements of the Act as well as the Acid Rain provisions required to be in all Title V permits.

A. ACID RAIN: [County Rule 210 §§302.1b(2) & 302.1f] [County Rule 371 §301]

1). Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the CAA and incorporated under County Rule 371, both provisions shall be incorporated into this Permit and shall be enforceable by the Administrator.

2) The Permittee shall not allow emissions exceeding any allowances that the source lawfully holds under Title IV of the CAA or the regulations promulgated thereunder and incorporated under County Rule 371.

a) No permit revision shall be required for increases in emissions that are authorized by allowances acquired under the acid rain program and incorporated under County Rule 371, provided that such increases do not require a permit revision under any other applicable requirement.

b) No limit is placed on the number of allowances held by the Permittee. The Permittee may not, however, use allowances as a defense to non-compliance with any other applicable requirement.

c) Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the CAA.

d) All of the following prohibitions apply to any unit subject to the provisions of Title IV of the CAA and incorporated into this Permit under County Rule 371:

(1) Annual emissions of sulfur dioxide in excess of the number of allowances to emit sulfur dioxide held by the owners or operators of the unit or the designated representative of the owners or operators.

(2) Exceedances of applicable emission rates.

(3) The use of any allowance prior to the year for which it was allocated.

(4) Violation of any other provision of the permit.

B. ASBESTOS: [40 CFR 61, Subpart M] [County Rule 370 §301.8 - locally enforceable only]
The Permittee shall comply with the applicable requirements of Sections 61.145 through 61.147 and 61.150 of the National Emission Standard for Asbestos and County Rule 370 for all demolition and renovation projects.

C. RISK MANAGEMENT PLAN (RMP): [40 CFR 68]
Should this stationary source, as defined in 40 CFR 68.3, be subject to the accidental release prevention regulations in 40 CFR Part 68, then the Permittee shall submit an RMP by the date specified in 40 CFR Section 68.10 and shall certify compliance with the requirements of 40 CFR Part 68 as part of the annual compliance certification as required by 40 CFR Part 70. However, neither the RMP nor modifications to the RMP shall be considered to be a part of this Permit.

D. STRATOSPHERIC OZONE PROTECTION: [40 CFR 82 Subparts E, F, and G]
If applicable, the Permittee shall follow the requirements of 40 CFR 82.106 through 82.124 with respect to the labeling of products using ozone depleting substances.

If applicable, the Permittee shall comply with all of the following requirements with respect to recycling and emissions reductions:

1) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices under 40 CFR 82.156.

2) Equipment used during maintenance, service, repair, or disposal of appliances must meet the standards for recycling and recovery equipment in accordance with 40 CFR 82.158.

3) Persons performing maintenance, service, repair, or disposal of appliances must be certified by a certified technician under 40 CFR 82.161.

If applicable, the Permittee shall follow the requirements of 40CFR 82 Subpart G, including all Appendices, with respect to the safe alternatives policy on the acceptability of substitutes for ozone-depleting compounds.

7. DUTY TO SUPPLEMENT OR CORRECT APPLICATION: [County Rule 210 §301.6]
If the Permittee fails to submit any relevant facts or has submitted incorrect information in a permit application, the Permittee shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. In addition, the Permittee shall provide additional information as necessary to address any requirements that become applicable to the source after the date it filed a complete application but prior to release of a proposed permit.

8. EMERGENCY EPISODES: [County Rule 600 §302] [SIP Rule 600 §302]
If an air pollution alert, warning, or emergency has been declared, the Permittee shall comply with any applicable requirements of County Rule 600 §302.

9. EMERGENCY PROVISIONS: [County Rule 130 §§201 & 402]
An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, that require immediate corrective action to restore normal operation, and that cause the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

An emergency constitutes an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if the requirements of this Permit Condition are met.

The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

A. An emergency occurred and that the Permittee can identify the cause or causes of the emergency;
B. At the time of the emergency, the permitted source was being properly operated;
C. During the period of the emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in this permit; and
D. The Permittee as soon as possible telephoned the Control Officer, giving notice of the emergency, and submitted notice of the emergency to the Control Officer by certified mail, facsimile, or hand delivery within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice fulfills the requirement of County Rule 210 §302.1.e(2) with respect to deviation reporting. This notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective action taken.

In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

This provision is in addition to any emergency or upset provision contained in any applicable requirement.

10. EXCESS EMISSIONS: [County Rule 140 §§103, 401 & 402]
NOTE: There are reporting requirements associated with excess emissions. These requirements are contained in the Reporting section of the General Permit Conditions in a subparagraph called Excess Emissions. The definition of excess emissions can be found in County Rule 100 §200.

A. Exemptions: The excess emissions provisions of this Permit Condition do not apply to the following standards and limitations:

1) Promulgated pursuant to Section 111 (Standards Of Performance for New Stationary Sources) of the Clean Air Act (Act) or Section 112 (National Emission Standards For Hazardous Air Pollutants) of the Act;
2) Promulgated pursuant to Title IV (Acid Deposition Control) of the Act or the regulations promulgated thereunder and incorporated under Rule 371 (Acid Rain) of these rules or Title VI (Stratospheric Ozone Protection) of the Act;
3) Contained in any Prevention Of Significant Deterioration (PSD) or New Source Review (NSR) permit issued by the Environmental Protection Agency (EPA);
4) Included in a permit to meet the requirements of Rule 240 (Permit Requirements For New Major Sources And Major Modifications To Existing Major Sources), Subsection 308.1(e) (Permit Requirements For Sources Located In Attainment And Unclassified Areas) of these rules.

B. Affirmative Defense For Malfunctions: Emissions in excess of an applicable emission limitation due to malfunction shall constitute a violation. The owner and/or operator of a source with emissions in excess of an applicable emission limitation due to malfunction has an affirmative defense to a civil or administrative enforcement proceeding based on that violation, other than a judicial action seeking injunctive relief, if the owner and/or operator of the source has complied with the excess emissions reporting requirements of these Permit Conditions and has demonstrated all of the following:
1) The excess emissions resulted from a sudden and unavoidable breakdown of the process equipment or the air pollution control equipment beyond the reasonable control of the operator;
2) The source's air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;
3) If repairs were required, the repairs were made in an expeditious fashion when the applicable emission limitations were being exceeded. Off-shift labor and overtime were utilized where practicable to ensure that the repairs were made as expeditiously as possible. If off-shift labor and overtime were not utilized, then the owner and/or operator satisfactorily demonstrated that such measures were impractical;
4) The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;
5) All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;
6) The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance;
7) During the period of excess emissions, there were no exceedances of the relevant ambient air quality standards established in County Rule 510 that could be attributed to the emitting source;
8) The excess emissions did not stem from any activity or event that could have been foreseen and avoided, or planned, and could not have been avoided by better operations and maintenance practices;
9) All emissions monitoring systems were kept in operation, if at all practicable; and
The owner's and/or operator's actions in response to the excess emissions were documented by contemporaneous records.

C. Affirmative Defense For Startup And Shutdown:
1) Except as provided in paragraph 2) below, and unless otherwise provided for in the applicable requirement, emissions in excess of an applicable emission limitation due to

startup and shutdown shall constitute a violation. The owner and/or operator of a source with emissions in excess of an applicable emission limitation due to startup and shutdown has an affirmative defense to a civil or administrative enforcement proceeding based on that violation, other than a judicial action seeking injunctive relief, if the owner and/or operator of the source has complied with the excess emissions reporting requirements of these Permit Conditions and has demonstrated all of the following:

a. The excess emissions could not have been prevented through careful and prudent planning and design;
b. If the excess emissions were the result of a bypass of control equipment, the bypass was unavoidable to prevent loss of life, personal injury, or severe damage to air pollution control equipment, production equipment, or other property;
c. The source's air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;
d. The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable, during periods of such emissions;
e. All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;
f. During the period of excess emissions, there were no exceedances of the relevant ambient air quality standards established in County Rule 510 (Air Quality Standards) that could be attributed to the emitting source;
g. All emissions monitoring systems were kept in operation, if at all practicable; and
h. The owner's and/or operator's actions in response to the excess emissions were documented by contemporaneous records.

If excess emissions occur due to a malfunction during routine startup and shutdown, then those instances shall be treated as other malfunctions subject to paragraph A. of this Permit Condition.

D. Affirmative Defense For Malfunctions During Scheduled Maintenance: If excess emissions occur due to malfunction during scheduled maintenance, then those instances will be treated as other malfunctions subject to paragraph B.of this Permit Condition.

E. Demonstration Of Reasonable And Practicable Measures: For an affirmative defense under paragraphs A and B of this Permit Condition, the owner and/or operator of the source shall demonstrate, through submission of the data and information required by this Permit Condition and the excess emissions reporting requirements of these Permit Conditions, that all reasonable and practicable measures within the owner's and/or operator's control were implemented to prevent the occurrence of the excess emissions.

11. FEES: [County Rule 200 §409] [County Rule 210 §§302.1i & 401]
The Permittee shall pay fees to the Control Officer under ARS 49-480(D) and County Rule 280.

12. MODELING: [County Rule 200 §407] [locally enforceable only]
Where the Control Officer requires the Permittee to perform air quality impact modeling, the Permittee shall perform the modeling in a manner consistent with the "Guideline on Air Quality Models (Revised)" (EPA-450/2-78-027R, U.S. Environmental Protection Agency, Office of Air Quality

Planning and Standards, Research Triangle Park, N.C. 27711, July 1986) and "Supplement B to the Guideline on Air Quality Models" (U.S. Environmental Protection Agency, September 1990). Both documents shall be referred to hereinafter as "Guideline", and are adopted by reference. Where the person can demonstrate that an air quality impact model specified in the guideline is inappropriate, the model may be modified or another model substituted if found to be acceptable to the Control Officer.

13. MONITORING / TESTING:

A. The Permittee shall monitor, sample, or perform other studies to quantify emissions of regulated air pollutants or levels of air pollution that may reasonably be attributable to the facility if required to do so by the Control Officer, either by Permit or by order in accordance with County Rule 200 §309.

[County Rule 200 §309] [SIP Rule 41]

B. Except as otherwise specified in these Permit Conditions or by the Control Officer, the Permittee shall conduct required testing used to determine compliance with standards or permit conditions established under the County or SIP Rules or these Permit Conditions in accordance with County Rule 270 and the applicable testing procedures contained in the applicable Rule, the Arizona Testing Manual for Air Pollutant Emissions or other approved USEPA test methods.

[County Rule 200 §408] [County Rule 210 §302.1.c] [County Rule 270 §§300 & 400] [SIP Rule 27]

C. The owner or operator of a permitted source shall provide, or cause to be provided, performance testing facilities as follows:

1) Sampling ports adequate for test methods applicable to such source.
2) Safe sampling platform(s).
3) Safe access to sampling platforms(s).
4) Utilities for sampling and testing equipment.

[County Rule 270 §405] [SIP Rule 42]

14. PERMITS:

A. BASIC: [County Rule 210 §302.1h(3)]

This Permit may be revised, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any Permit Condition.

B. DUST CONTROL PLAN REQUIREMENTS:

(NOTE: If the Permittee engages in or allows any routine dust generating activities at the facility, the Permittee needs to have the routine dust generating activity covered as part of this Permit. Nonroutine activities, such as construction, require a separate Earthmoving Permit that must be obtained from the Control Officer before the activity may begin.)

1) The Permittee must first submit a Dust Control Plan and obtain the Control Officer's approval of the Dust Control Plan before commencing any routine dust generating operation.

[County Rule 310 §303.3] [SIP Rule 310 §303.3]

2) A Dust Control Plan shall not be required to play on a ball field and/or for landscape maintenance. For the purpose of this Permit Condition, landscape maintenance does not include grading, trenching, nor any other mechanized surface disturbing activities.

[County Rule 310 §303.4] [SIP Rule 310 §303.4]

3) Any Dust Control Plan shall, at a minimum, contain all the information described in Section 304 of Rule 310.

[County Rule 310 §§303.1 & 304] [SIP Rule 310 §§303.1 & 304]

4) Regardless of whether an approved Dust Control Plan is in place or not, the Permittee is still subject to all requirements of Rule 310 at all times.

[County Rule 310 §303] [SIP Rule 310 §303]

C. PERMITS AND PERMIT CHANGES, AMENDMENTS AND REVISIONS:

1) The Permittee shall comply with the Administrative Requirements of Section 400 of County Rule 210 for all changes, amendments and revisions at the facility for any source subject to regulation under County Rule 200, shall comply with all required time frames, and shall obtain any required preapproval from the Control Officer before making changes. All applications shall be filed in the manner and form prescribed by the Control Officer. The application shall contain all the information necessary to enable the Control Officer to make the determination to grant or to deny a permit or permit revision including information listed in County Rule 200 §308 and County Rule 210 §§301 & 302.3.

[County Rule 200 §§301 & 308] [County Rule 210 §§301.4a, b, c, & 400]

2) The Permittee shall supply a complete copy of each application for a permit, a minor permit revision, or a significant permit revision directly to the Administrator of the USEPA. The Control Officer may require the application information to be submitted in a computer-readable format compatible with the Administrator's national database management system.

[County Rule 210 §§303.1a, 303.2, 405.4, & 406.4]

3) While processing an application, the Control Officer may require the applicant to provide additional information and may set a reasonable deadline for a response.

[County Rule 210 §301.4f]

4) No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

[County Rule 210 §302.1j]

D. POSTING:

1) The Permittee shall keep a complete permit clearly visible and accessible on the site where the equipment is installed.

[County Rule 200 §311]

2) If a Dust Control Plan, as required by Rule 310, has been approved by the Control Officer, the Permittee shall post a copy of the approved Dust Control Plan in a conspicuous location at the work site, within on-site equipment, or in an on-site vehicle, or shall otherwise keep a copy of the Dust Control Plan available on site at all times.

[County Rule 310 §401] [SIP Rule 310 §401]

E. PROHIBITION ON PERMIT MODIFICATION: [County Rule 200 §310]

The Permittee shall not willfully deface, alter, forge, counterfeit, or falsify this permit.

F. RENEWAL:

1) The Permittee shall submit an application for the renewal of this Permit in a timely and complete manner. For purposes of permit renewal, a timely application is one that is submitted at least six months, but not more than 18 months, prior to the date of permit expiration. A complete application shall contain all of the information required by the County Rules including Rule 200 §308 and Rule 210 §§301 & 302.3.

[County Rule 210 §§301.2a, 301.4a, b, c, d, h & 302.3]

2) The Permittee shall file all permit applications in the manner and form prescribed by the Control Officer. To apply for a permit renewal, the Permittee shall complete the "Standard Permit Application Form" and shall supply all information, including the information required by the "Filing Instructions" as shown in Appendix B of the County Rules, which is necessary to enable the Control Officer to make the determination to grant or to deny a permit which shall contain such terms and conditions as the Control Officer deems necessary to assure a source's compliance with the requirements of the CAA, ARS and County Rules.

[County Rule 200 §§308 & 309] [County Rule 210 §301.1]

3) The Control Officer may require the Permittee to provide additional information and may set a reasonable deadline for a response.

[County Rule 210 §301.4f]

4) If the Permittee submits a timely and complete application for a permit renewal, but the Control Officer has failed to issue or deny the renewal permit before the end of the term of the previous permit, then the permit shall not expire until the renewal permit has been issued or denied. This protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit, by the deadline specified by the Control Officer, any additional information identified as being needed to process the application.

[County Rule 200 §403.2] [County Rule 210 §§301.4f & 301.9]

G. REVISION / REOPENING / REVOCATION:

1) This permit shall be reopened and revised to incorporate additional applicable requirements adopted by the Administrator pursuant to the CAA that become applicable to the facility if this permit has a remaining permit term of three or more years. No such reopening is required if the effective date of the requirement is later than the date on which this Permit is due to expire unless the original permit or any of its terms have been extended pursuant to Rule 200 §403.2.

[County Rules 200 §402.1]

Any permit revision required under this Permit Condition, 14.G.1, shall reopen the entire permit and shall comply with provisions in County Rule 200 for permit renewal *(Note: this includes a facility wide application and public comment on the entire permit)* and shall reset the five year permit term.

[County Rules 200 §402.1a(1) & 210 §302.5]

2) This permit shall be reopened and revised under any of the following circumstances:

a) Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the Title V permit.

b) The Control Officer or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

c) The Control Officer or the Administrator determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

Proceedings to reopen and issue a permit under this Permit Condition, 14.G.2, shall follow the same procedures as apply to initial permit issuance and shall effect only those parts of the Permit for which cause to reopen exists.

[County Rule 200 §402.1]

3) This permit shall be reopened by the Control Officer and any permit shield revised, when it is determined that standards or conditions in the permit are based on incorrect information provided by the applicant.

[County Rule 210 §407.3]

4) This Permit may be revised, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Permit revision, revocation and reissuance, or termination or of a notification of planned changes or anticipated noncompliance does not stay any Permit Condition.

[County Rule 210 §302.1h(3)]

H. REVISION UNDER A FEDERAL HAZARDOUS AIR POLLUTANT STANDARD:
[County Rule 210 §301.2c] [locally enforceable only]
If the Permittee becomes subject to a standard promulgated by the Administrator under Section 112(d) of the CAA, the Permittee shall, within 12 months of the date on which the standard is promulgated, submit an application for a permit revision demonstrating how the source will comply with the standard.

I. REQUIREMENTS FOR A PERMIT:

1) Air Quality Permit: Except as noted under the provisions in Sections 403 and 405 of County Rule 210, no source may operate after the time that it is required to submit a timely and complete application, except in compliance with a permit issued under County Rule 210. Permit expiration terminates the Permittee's right to operate. However, if a source submits a timely and complete application, as defined in County Rule 210 §301, for permit issuance, revision, or renewal, the source's failure to have a permit is not a violation of the County Rules until the Control Officer takes final action on the application. The Source's ability to operate without a permit as set forth in this paragraph shall be in effect from the date the application is determined to be complete until the final permit is issued. This protection shall cease to apply if, subsequent to the completeness determination, the applicant fails to submit, by the deadline specified in writing by the Control Officer, any additional information identified as being needed to process the application. If a source submits a timely and complete application for a permit renewal, but the Control Officer has failed to issue or deny the renewal permit before the end of the term of the previous permit, then the permit shall not expire until the permit renewal has been issued or denied.

[County Rule 210 §301.9]

2) Earthmoving Permit:
(NOTE: If the Permittee engages in or allows any routine dust generating activities at the facility, the Permittee needs to have the routine dust generating activity covered as part of this Permit. Non-routine activities, such as construction, require a separate Earthmoving Permit that must be obtained from the Control Officer before the activity may begin.)
The Permittee shall not cause, commence, suffer, allow, or engage in any earthmoving operation that disturbs a total surface area of 0.10 acre or more without first obtaining a permit from the Control Officer. Permits shall not be required for earthmoving operations for emergency repair of utilities, paved roads, unpaved roads, shoulders, and/or alleys.
[County Rule 200 §305]

3) Burn Permit: The Permittee shall obtain a Permit To Burn from the Control Officer before conducting any open outdoor fire except for the activities listed in County Rule 314 §§302.1 and 302.2.
[County Rule 314] [County Rule 200 §306] [SIP Rule 314]

J. RIGHTS AND PRIVILEGES: [County Rule 210 §302.1h (4)]
This Permit does not convey any property rights nor exclusive privilege of any sort.

K. SEVERABILITY: [County Rule 210 §302.1g]
The provisions of this Permit are severable, and, if any provision of this Permit is held invalid, the remainder of this Permit shall not be affected thereby.

L. SCOPE:
The issuance of any permit or permit revision shall not relieve the Permittee from compliance with any Federal laws, Arizona laws, or the County or SIP Rules, nor does any other law, regulation or permit relieve the Permittee from obtaining a permit or permit revision required under the County Rules.
[County Rule 200 §308]

Nothing in this permit shall alter or affect the following:
1) The provisions of Section 303 of the Act (Emergency Orders), including the authority of the Administrator of the USEPA under that section.
2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.
3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Act.
4) The ability of the Administrator of the USEPA or of the Control Officer to obtain information from the Permittee under Section 114 of the Act, or any provision of State law.
5) The authority of the Control Officer to require compliance with new applicable requirements adopted after the permit is issued. [locally enforceable only]
[County Rule 210 §407.2]

M. TERM OF PERMIT: [County Rule 210 §§302.1a & 402]
This Permit shall remain in effect for no more than 5 years from the date of issuance.

N. TRANSFER: [County Rule 200 §404]

Except as provided in ARS §49-429 and County Rule 200, this permit may be transferred to another person if the Permittee gives notice to the Control Officer in writing at least 30 days before the proposed transfer and complies with the permit transfer requirements of County Rule 200 and the administrative permit amendment procedures under County Rule 210.

15. RECORDKEEPING:

A. RECORDS REQUIRED: [County Rule 100 §501] [County Rule 310 §502] [SIP Rule 40 A]
The Permittee shall maintain records of all emissions testing and monitoring, records detailing all malfunctions which may cause any applicable emission limitation to be exceeded, records detailing the implementation of approved control plans and compliance schedules, records required as a condition of any permit, records of materials used or produced, and any other records relating to the emission of air contaminants which may be requested by the Control Officer.

B. RETENTION OF RECORDS:
Unless a longer time frame is specified by these Permit Conditions, information and records required by applicable requirements and copies of summarizing reports recorded by the Permittee and submitted to the Control Officer shall be retained by the Permittee for 5 years after the date on which the information is recorded or the report is submitted
[County Rule 100 §504] [SIP Rule 40 C]

The Permittee shall retain records of all required monitoring data and support information for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.
[County Rule 210 §§302.1d(2)]

C. MONITORING RECORDS: [County Rule 210 §§302.1d(1) & 305.1b]
Records of any monitoring required by this Permit shall include the following:
1) The date, place as defined in the permit, and time of sampling or measurements;
2) The date(s) analyses were performed;
3) The name of the company or entity that performed the analysis;
4) The analytical techniques or methods used;
5) The results of such analysis; and
6) The operating conditions as existing at the time of sampling or measurement.

D. RIGHT OF INSPECTION OF RECORDS: [County Rule 100 §106] [SIP Rule 40 D]
When the Control Officer has reasonable cause to believe that the Permittee has violated or is in violation of any provision of County Rule 100 or any County Rule adopted under County Rule 100, or any requirement of this permit, the Control Officer may request, in writing, that the Permittee produce all existing books, records, and other documents evidencing tests, inspections, or studies which may reasonably relate to compliance or noncompliance with County Rules adopted under County Rule 100. No person shall fail nor refuse to produce all existing documents required in such written request by the Control Officer.

16. REPORTING:

NOTE: See the Permit Condition titled Certification Of Truth, Accuracy and Completeness in conjunction with reporting requirements.

A. ANNUAL EMISSION INVENTORY REPORT: [County Rule 100 §505] [SIP Rule 40 B]
Upon request of the Control Officer and as directed by the Control Officer, the Permittee shall complete and shall submit to the Control Officer an annual emissions inventory report. The report is due by April 30, or 90 days after the Control Officer makes the inventory form(s) available, whichever occurs later.

The annual emissions inventory report shall be in the format provided by the Control Officer.

The Control Officer may require submittal of supplemental emissions inventory information forms for air contaminants under ARS §49-476.01, ARS §49-480.03 and ARS §49-480.04.

B. DATA REPORTING: [County Rule 100 §502]
When requested by the Control Officer, the Permittee shall furnish to the Maricopa County Air Quality Division (Division hereafter) information to locate and classify air contaminant sources according to type, level, duration, frequency, and other characteristics of emissions and such other information as may be necessary. This information shall be sufficient to evaluate the effect on air quality and compliance with the County or SIP Rules. The Permittee may subsequently be required to submit annually, or at such intervals specified by the Control Officer, reports detailing any changes in the nature of the source since the previous report and the total annual quantities of materials used or air contaminants emitted.

C. DEVIATION REPORTING: [County Rule 210 §§302.1e & 305.1c]
The Permittee shall promptly report deviations from permit requirements, including those attributable to upset conditions. Unless specified otherwise elsewhere in these Permit Conditions, an upset for the purposes of this Permit Condition shall be defined as the operation of any process, equipment or air pollution control device outside of either its normal design criteria or operating conditions specified in this Permit and which results in an exceedance of any applicable emission limitation or standard. The Permittee shall submit the report to the Control Officer within 2 working days from knowledge of the deviation. The report shall contain a description of the probable cause of such deviations and any corrective actions or preventive measures taken. In addition, the Permittee shall report within a reasonable time of any long-term corrective actions or preventative actions taken as the result of any deviations from permit requirements.

All instances of deviations from the requirements of this Permit shall also be clearly identified in the semiannual monitoring reports required in the Specific Condition section of these Permit Conditions.

D. EMERGENCY REPORTING: [County Rule 130 §402.4]
(NOTE: Emergency Reporting is one of the special requirements which must be met by a Permittee wishing to claim an affirmative defense under the emergency provisions of County Rule 130. These provisions are listed earlier in these General Conditions in the section titled "Emergency Provisions". Since it is a form of deviation reporting, the filing of an emergency report also satisfies the requirement of County Rule 210 to file a deviation report.)
The Permittee shall, as soon as possible, telephone the Control Officer giving notice of the emergency, and submitted notice of the emergency to the Control Officer by certified mail, facsimile, or hand delivery within 2 working days of the time when emission limitations were

exceeded due to the emergency. This notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective action taken.

E. EMISSION STATEMENTS REQUIRED AS STATED IN THE ACT:

[County Rule 100 §503]

Upon request of the Control Officer and as directed by the Control Officer, the Permittee shall provide the Control Officer with an emission statement, in such form as the Control Officer prescribes, showing measured actual emissions or estimated actual emissions of NO_x and volatile organic compounds (VOC) from that source. At a minimum, the emission statement shall contain all information contained in the "Guidance on Emission Statements" document as described in the USEPA's Aerometric Information Retrieval System (AIRS) Fixed Format Report (AFP 644). The statement shall contain emissions for the time period specified by the Control Officer. Statements shall be submitted annually.

F. EXCESS EMISSIONS REPORTING: [County Rule 140 §500] [locally enforceable only]

(NOTE: This reporting subsection is associated with the requirements listed earlier in these General Conditions in the section titled "Excess Emissions".)

1) The owner and/or operator of any source shall report to the Control Officer any emissions in excess of the limits established by the County or SIP Rules or by these Permit Conditions. The report shall be in two parts as specified below:
   a) Notification by telephone or facsimile within 24 hours of the time when the owner and/or operator first learned of the occurrence of excess emissions that includes all available information from paragraph 2) of this Permit Condition.
   b) Detailed written notification by submission of an excess emissions report within 72 hours of the notification required by paragraph 1) a) of this Permit Condition.

2) The excess emissions report shall contain the following information:
   a) The identity of each stack or other emission point where the excess emissions occurred;
   b) The magnitude of the excess emissions expressed in the units of the applicable emission limitation and the operating data and calculations used in determining the magnitude of the excess emissions;
   c) The time and duration or expected duration of the excess emissions;
   d) The identity of the equipment from which the excess emissions emanated;
   e) The nature and cause of such emissions;
   f) The steps taken, if the excess emissions were the result of a malfunction, to remedy the malfunction and the steps taken or planned to prevent the recurrence of such malfunctions;
   g) The steps that were or are being taken to limit the excess emissions; and
   h) If this Permit contains procedures governing source operation during periods of startup or malfunction and the excess emissions resulted from startup or malfunction, a list of the steps taken to comply with the Permit procedures.

3) In the case of continuous or recurring excess emissions, the notification requirements of this Permit Condition shall be satisfied if the source provides the required notification after excess emissions are first detected and includes in the notification an estimate of the time the excess emissions will continue. Excess emissions occurring after the estimated time period or changes in the nature of the emissions as originally reported shall require additional notification pursuant to paragraphs 1) and 2) of this Permit Condition.

G. OTHER REPORTING: [County Rule 210 §302.1h(5)]

The Permittee shall furnish to the Control Officer, within a reasonable time, any information that the Control Officer may request in writing to determine whether cause exists for revising, revoking and reissuing this permit, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Control Officer copies of records required to be kept by this Permit. For information claimed to be confidential, the Permittee shall furnish a copy of such records directly to the Administrator of the USEPA along with a claim of confidentiality as covered elsewhere in these Permit Conditions.

17. RIGHT TO ENTRY AND INSPECTION OF PREMISES:

The Control Officer, during reasonable hours, for the purpose of enforcing and administering County Rules or any provision of ARS relating to the emission or control prescribed pursuant thereto, may enter every building, premises, or other place, except the interior of structures used as private residences. Every person is guilty of a petty offense under ARS §49-488 who in any way denies, obstructs or hampers such entrance or inspection that is lawfully authorized by warrant.

[County Rule 100 §105]

The Permittee shall allow the Control Officer or his authorized representative, upon presentation of proper credentials and other documents as may be required by law, to:

A. Enter upon the Permittee's premises where a source is located or emissions-related activity is conducted, or where records are required to be kept under the conditions of the permit;

[County Rule 210 §305.1f] [SIP Rule 43]

B. Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;

[County Rule 210 §305.1f] [SIP Rule 43]

C. Inspect, at reasonable times, any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

[County Rule 210 §305.1f] [SIP Rule 43]

D. Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements; and

[County Rule 210 §305.1f] [SIP Rule 43]

To record any inspection by use of written, electronic, magnetic, and photographic media.

[County Rule 210 §305.1f] [Locally enforceable only]

SPECIFIC CONDITIONS

18. ALLOWABLE EMISSIONS LIMITATIONS

The allowable emission limitations of these Permit Conditions are based upon the facility as presently constructed and operated. They do not provide for facility changes or changes in the method of operation that would otherwise trigger new applicable requirements including New Source Review (NSR) or Best Available Control Technology (BACT).

A. Facility-Wide Requirements

1) Opacity

a) The Permittee shall not discharge into the ambient air from any single source of emissions any air contaminant, other than uncombined water, in excess of 20 percent opacity, except as provided in County Rule 300§302.

[County Rule 300§301][locally enforceable only]

b) Except as otherwise provided in Regulation I, Rule 4, Exceptions, the opacity of any plume or effluent from any source of emissions, other than uncombined water, shall not be greater than 40 percent opacity as determined by Reference Method 9 in the Arizona Testing Manual.

[SIP Rule 30]

2) Gaseous and Odorous Emissions: The Permittee shall not emit gaseous or odorous air contaminants from equipment, operations or premises under his control in such quantities or concentrations as to cause air pollution.

[County Rule 320 § 300][SIP Rule 32A]

3) Permit Shield

Compliance with the terms of sections 1) and 2) above shall be deemed compliance with the following applicable requirement(s) in effect on the date of permit issuance: County Rule 300§301, SIP Rule 30, County Rule 320 § 300, SIP Rule 32A.

[County Rule 210§407.1]

4) Facility-Wide VOC limits

The Permittee shall not allow emissions from the facility to be emitted into the atmosphere in excess of the following limits:

Table 1: Facility-Wide Emissions Limits

Pollutant	Monthly emission limit	* Rolling 12-Month Emission Limit
Total Volatile Organic Compounds (VOCs)	23000 lbs/month	80.3 tons per year

*The rolling twelve-month emissions shall be calculated by summing the total emissions over the most recent twelve calendar months.

[County Rule 210 §302.1b]

B. Goodrich Leased Requirements

1) The Permittee shall not allow emissions from Goodrich Leased to be emitted into the atmosphere in excess of any of the following limits:

Table 2: VOC Emission Limits applicable to Goodrich Leased

Pollutant	Monthly emission limit	* Rolling 12-Month Emission Limit
Total Volatile Organic Compounds (VOCs)	4000 lbs/month	20 tons per year

*The rolling twelve-month emissions shall be calculated by summing the total emissions over the most recent twelve calendar months.

[County Rule 210 §302.1b]

C. Graphic Arts Operations Requirements applicable to Equipment/Activity ID #s E and J

1) The Permittee shall not cause, allow, or permit VOC emissions in excess of 25 tons per calendar year and 4200 lbs/month of VOC from all graphic arts and related coating operations at Goodrich Corporation Aircraft Interior Products. The emissions from these operations must also be counted towards the emission limitations under Table 1 of this permit.

[County Rule 337 §306.1][SIP Rule 337 §306.1]

2) Permit Shield

Compliance with the terms of this section shall be deemed compliance with the following applicable requirement(s) in effect on the date of permit issuance: County Rule 337§306.1, and SIP Rule 337§306.1. Exceedance of 25 tons per

calendar year or 4200 lbs/month of VOC threshold renders the Permit Shield for County Rule 337§306.1, and SIP Rule 337§306.1 void.

[County Rule 210§407.1]

D. Spray Paint Booth Requirements applicable to Equipment/Activity ID # F

1) The Permittee shall limit emission into the atmosphere from the surface coating operation (Paint Booth) as follows:

Table 3: Paint Booth Emission Limits

	Daily Emission Limits (lb/day)	*Twelve Month Rolling Average Emission Limits
Volatile Organic Compounds (VOCs)	20.0 lb/day	2.0 TPY
Total Particulates	2.2 lb/day	400.0 lb/yr
PM_{10}	2.2 lb/day	400.0 lb/yr
Antimony Oxide	0.8 lb/day	150.0 lb/yr

* The twelve-month rolling average shall be calculated by summing the total emissions from the Paint Booth over the most recent twelve calendar months.

[County Rule 241 §302]

2) The Permittee shall not perform surface coating operations on aerospace parts and assemblies critical to the vehicle's structural integrity or flight performance.

[40 CFR §63.741(f)][Significant Permit Revision Number S96-001]

E. Service Center Requirements

1) The Permittee shall not cause, allow, or permit emissions from the Service Center in excess of the following 12 month rolling limit:

Table 4: Emission Limits applicable to the Service Center Operation

Pollutant	* Rolling 12-Month Emission Limit
Total Volatile Organic Compounds (VOCs)	3 tons

* The rolling twelve month emissions shall be calculated by summing the total emissions for the Service Center Operation over the most recent twelve calendar months.

[County Rule 210 §302.1b]

19. OPERATIONAL LIMITATIONS/STANDARDS:

A. Facility-Wide Operational Limitations

1) Material Containment Required: Materials including, but not limited to, solvents or other volatile compounds, paints, acids, alkalies, pesticides, fertilizer and manure shall be processed, stored, used and transported in such a manner and by such means that they will not unreasonably evaporate, leak, escape or be otherwise discharged into the ambient air so as to cause or contribute to air pollution. Where means are available to reduce effectively the contribution to air pollution from evaporation, leakage or discharge, the installation and use of such control methods, devices or equipment shall be mandatory.

[County Rule 320 §302][SIP Rule 32C]

2) Stack Requirements: Where a stack, vent or other outlet is at such a level that air contaminants are discharged to adjoining property, the Control Officer may require the installation of abatement equipment or the alteration of such stack, vent, or other outlet to a degree that will adequately dilute, reduce or eliminate the discharge of air contaminants to adjoining property.

[County Rule 320 §303] [SIP Rule 32D]

3) Permit Shield

Compliance with the terms of this section shall be deemed compliance with the following applicable requirement(s) in effect on the date of permit issuance: County Rule 320 §§ 302, 303, SIP Rule 32C, and SIP Rule 32D.

[County Rule 210§407.1]

B. Operational Requirements for Manufacturing Operations, Service Center, and the Paint Booth

The following requirements apply to Manufacturing Operations (at Goodrich Existing and Goodrich Leased), Service Center, and the Paint Booth

1) The Permittee shall not apply any surface coating including any VOC-containing materials added to the original coating supplied by the manufacturer, which contain VOC in excess of the limits in Tables 348a and 348b below:

[County Rule 348 §301][SIP Rule 348 §301]

Table 348a:

PRIMER or TOPCOAT TYPE	VOC LIMITS (g/L)
All Primers (except Specialty or General Aviation Rework Facility Primers)	350 g/l
All Topcoats (except Specialty or General Aviation Rework Facility Topcoats)	420 g/l
General Aviation Rework Facility Primers	540 g/l
General Aviation Rework Facility Topcoats	540 g/l

Table 348b:

Type of Specialty Coating	VOC Limits (g/L)
Ablative Coating	600
Adhesion Promoter	890
Adhesive Bonding Primers: Cured at 250°F or below	850
Adhesive Bonding Primers: Cured above 250°F	1030
Adhesives: Commercial Interior	760
Adhesives: Cyanoacrylate	1,020
Adhesives: Fuel Tank	620
Adhesives: Nonstructural	360
Adhesives: Rocket Motor Bonding	890
Adhesives: Rubber-based	850
Adhesives: Structural Autoclavable	60
Adhesives: Structural Nonautoclavable	850
Antichafe Coating	660
Bearing Coating Compounds	620
Caulking and Smoothing Compounds	850
Chemical Agent-Resistant Coating	550
Clear Coating	720
Commercial Exterior Aerodynamic Structure Primer	350
Compatible Substrate Primer	350
Corrosion Prevention Compound	710
Cryogenic Flexible Primer	350
Cryoprotective Coating	600

Coatings Related To Electromagnetism And/Or Other Radiation Electric Or Radiation-Effect Coating	600
Electrostatic Discharge and Electromagnetic Interference (EMI) Coating	800
Elevated Temperature Skydrol Resistant Commercial Primer	350
Epoxy Polyamide Topcoat	420
Fire-Resistant (Interior) Coating	800
Flexible Primer	350
Flight-Test Coatings: Missile or Single Use Aircraft	420
Flight-Test Coatings: All Other	840
Fuel-Tank Coating	720
High-Temperature Coating	850
Insulation Covering	740
Intermediate Release Coating	750
Lacquer	830
Maskant: Bonding Maskant	420
Maskant: Critical Use and Line Sealer Maskant	420
Maskant: Seal Coat Maskant	420
Metallized Epoxy Coating	740
Mold Release	780
Optical Anti-Reflective Coating	750
Part Marking Coating	850
Pretreatment Coating	780
Rain Erosion-Resistant Coating	420
Resin Surface Sealer	695
Rocket Motor Nozzle Coating	660
Scale Inhibitor	880
Screen Print Ink	840
Sealants: Extrudable/Rollable/Brushable Sealant	240
Sealants: Sprayable Sealant	600
Self-priming Topcoat	420
Silicone Insulation Material	850
Solid Film Lubricant	880
Specialized Function Coating	890
Temporary Protective Coating	250
Thermal Control Coating	800
Wet Fastener Installation Coating	675
Wing Coating	420

2) Exemptions:

The following coating types are exempt from the VOC content limits set forth in Table 348a and 348b of these permit Conditions and Section 301 of County Rule 348:

(1) Touchup coatings
(2) Hand-held aerosol can operations
(3) DOD “classified” coatings
(4) Coating of space vehicles; and

(5) Low usage coatings used in separate formulations in volumes of less than 50 gallons per year facility-wide with a maximum exemption of 200 gallons total for such formulations are exempted from the VOC limits set forth in Tables 348a and 348b and Tables 1a and 1b in Section 301 of County Rule 348.

[County Rule 348 §308.1][SIP Rule 348 §308.1]

3) Application Equipment:

A person shall use one or more of the following application techniques in applying any primer or topcoat to aerospace vehicles or components:flow/curtain coat; dip coat; roll coating; brush coating; cotton-tipped swab application; electrodeposition (DIP) coating; high volume low pressure (HVLP) spraying; electrostatic spray; or other coating application methods that can demonstrate and be approved by the Control Officer as having at least a 65% transfer efficiency, which is equivalent to the transfer efficiency of HVLP or electrostatic spray application methods.

[County Rule 348 §304][SIP Rule 348 §304]

4) VOC Containment And Disposal:

a) Aerospace Operations

(1) All fresh and used VOC containing material, including but not limited to cleaning solvents, coatings, thinners, rags, and their residues, shall be stored in closed, leak free, legibly labeled containers when not in use. In addition, the owner or operator must implement handling and transfer procedures to minimize spills during filling and transferring the cleaning solvent to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh or used cleaning solvents.

[County Rule 348 §307][SIP Rule 348 §307]

(2) Cotton-tipped swabs used for very small cleaning operations and aqueous cleaning solvents are exempt from the above condition (4) a) 1)).

[County Rule 348 §308.4][SIP Rule 348 §308.4]

b) Graphic Arts Operations

All VOC-containing materials used for cleaning and cleanup, including rags and towels, shall be stored in closed containers when not in use
[County Rule 337 §303][SIP Rule 337 §303]

5) Permit Shield

Compliance with the terms of this section shall be deemed compliance with the following applicable requirement(s) in effect on the date of permit issuance: County Rule 337 §303, SIP Rule 337 §303, County Rule 348 §§308.4,307, 304, 308.1, 301, SIP Rule 348 §§308.4, 307, 304, 308.1, 301.
[County Rule 210§407.1]

C. Solvent Cleaning Requirements

1) Dip Cleaning

a) Solvent Handling Requirements

(1) All cleaning-solvent, including solvent soaked materials, shall be kept in closed leakfree containers that are opened only when adding or removing materials. Each container shall be clearly labeled with its contents.
[County Rule 331 §301.1][SIP Rule 331 §301.1]

(2) If any cleaning-solvent escapes from a container, the permittee shall wipe up or otherwise remove immediately if in accessible areas and for areas where access is not feasible during normal production, remove as soon as reasonably possible.
[County Rule 331 §301.2][SIP Rule 331 §301.2]

(3) Unless records show that VOC-containing cleaning material was sent offsite for legal disposal, it will be assumed that it evaporated on site.
[County Rule 331 §301.3][SIP Rule 331 §301.3]

b) Equipment Requirements For All Cleaning Machines

(1) The Permittee shall provide a leakfree container (degreaser) for the solvents and the articles being cleaned.

The VOC-containment portion shall be impervious to VOC-containing liquid and vapors.
[County Rule 331 §302.1] [SIP Rule 331 §302.1]

(2) The Permittee shall maintain and operate all cleaning machine equipment required by County Rule 331 and any of its emission controls required by County Rule 331.

[County Rule 331 §302.2] [SIP Rule 331 §302.2.]

c) Partial Exemption from Section 300

(1) The provisions of Section 303 through 307 of County Rule 331 shall not apply to any non-vapor cleaning machine (degreaser) or dip-tank fitting either of the following descriptions, except that these shall be covered when work is not being processed.

(a) A small cleaner having a liquid surface area of 1 square foot (0.09 square meters) or less, or
(b) A small cleaner having a maximum capacity of one gallon (3.79 liters) or less.

[County Rule 331 §308.2b.][SIP Rule 331 §308.2b]

2) Hand Wipe Cleaning

(a) Cleaning solvents used in hand-wipe cleaning operations shall utilize an aqueous cleaning solvent, or have a VOC composite vapor pressure less than or equal to 45 millimeters of mercury (mm Hg) at 20° C.

[County Rule 348 §305.1][SIP Rule 348 §305.1]

(b) Cleaning and surface activation prior to adhesive bonding shall not be subject to the above condition (19.C.2.a.).

[County Rule 348 §308.3][SIP Rule 348 §308.3]

3) Permit Shield

Compliance with the terms of this section shall be deemed compliance with the following applicable requirement(s) in effect on the date of permit issuance: County Rule 331 §§301.1, 301.2, 301.3, 302.1, 302.2, 308.2b. SIP Rule 331 §§301.1, 301.2, 301.3, 302.1, 302.2, 308.2b, County Rule 348 §§305.1, 308.3, SIP Rule 348 §§305.1, 308.3.

[County Rule 210§407.1]

D. Spray Gun Cleaning

1) All spray guns must be cleaned by one or more of the following methods:

(1) Enclosed spray gun cleaning system, provided that it is kept closed when not in use and leaks are repaired within 14 days from when the leak is first discovered. If the leak is not repaired by the 15th day after detection, the solvent shall be removed and the enclosed cleaner shall be shut down until the leak is repaired or its use is permanently discontinued;

(2) Unatomized discharge of solvent into a waste container that is kept closed when not in use;
(3) Disassembly of the spray gun and cleaning in a vat that is kept closed when not in use; or
(4) Atomized spray into a waste container that is fitted with a device designed to capture atomized solvent emissions.

[County Rule 348 §306][SIP Rule 348 §306]

2) Permit Shield

Compliance with the terms of this section shall be deemed compliance with the following applicable requirement(s) in effect on the date of permit issuance: County Rule 348 §306 and SIP Rule 348§306.

[County Rule 210§407.1]

E. Spray Paint Booth Requirements

1) The Permittee shall not use or operate any spray painting or spray coating equipment unless one of the following conditions is met:
a) The Permittee shall install and operate a filtering system on any spray booth or enclosure with forced air exhaust.
(1) The filtering system shall have an average overspray removal efficiency of at least 92% by weight, as specified in writing by the manufacturer, for the type of material being sprayed
(2) No gaps, sags or holes shall be present in the filters and all exhaust must be discharged into the atmosphere.

[County Rule 315 §301.2] [locally enforceable only]

b) Should the Permittee operate spray coating equipment outside of a building, the Permittee shall operate all spray coating equipment inside an enclosure which has at least three sides a minimum of eight feet in height and able to contain any object(s) being coated.
(1) For three-sided enclosures, the Permittee shall direct the spray in a horizontal or downward pointing manner so that overspray is directed at the walls or floor of the enclosure. No spraying shall be conducted within three feet of any open end and/or within two feet of the top of the enclosure.
(2) For enclosures with three sides and a roof, or for complete enclosures, the Permittee shall direct the spray into the enclosure so that the overspray is directed away from any opening in the enclosure. No spraying shall be conducted within three feet of any open end and/or within two feet of any open top of the enclosure.

[County Rule 315 § 301.1][locally enforceable only]

2) The Permittee shall be exempt from the previous permit condition above if the spray coating operation is one of the following:

a) Spray coating of buildings or dwellings, including appurtenances and any other ornamental objects that are not normally removed prior to coating;
b) Spray coating of facility equipment or structures which are fixed in a permanent location and cannot easily be moved into an enclosure or spray booth and which are not normally dismantled or moved prior to coating;
c) Spray coating of objects which cannot fit inside of an enclosure with internal dimensions of 10'W x 25'L x 8'H;
d) Enclosures and spray booths and exhausts located entirely in a completely enclosed building, providing that any vents or openings do not allow overspray to be emitted into the outside air; or
e) Coating operations utilizing only hand-held aerosol cans.

[County Rule 315 § 302][locally enforceable only]

3) All spray coating operations shall be conducted utilizing a spray gun with a transfer efficiency of at least 65% as certified by the manufacturer and accepted by the Control Officer. Other methods of application may be used if they result in at least a 65% transfer efficiency.

[County Rule 348 §304][SIP Rule 348 §304]

4) The exhaust from all paint booths shall be directed vertically up into the atmosphere.

[County Rule 241 §302]

5) The Permittee shall fully train all individuals before they are allowed to operate any surface coating equipment (paint booth). Training shall include, at a minimum, proper application techniques, cleaning procedures, and equipment setup and adjustment as well as recordkeeping, VOC containment and VOC disposal requirement. Refresher training shall be given at least annually.

[County Rule 241 §302]

6) Permit Shield

Compliance with the terms of this section shall be deemed compliance with the following applicable requirement(s) in effect on the date of permit issuance: County Rule 315 §§301.2, 301.1, § 302, County Rule 348 §304, and SIP Rule 348 §304.

[County Rule 210§407.1]

F. Wind Machine Requirements

1) 3-way Catalytic converters with a minimum 80% control efficiency for Carbon Monoxide (CO), Nitrogen Oxides (NO_x) and VOC shall be installed, maintained and operated on the wind machines.

[County Rule 241 §302][County Rule 210 §302.1b]

2) The operating hours of the wind machines shall not exceed a total of 600 machine-hours annually for the entire array of wind machines based on a twelve month rolling total. The twelve month rolling total shall be calculated by summing the total machine-hours the wind machines are in operation over the most recent twelve calendar months.

[County Rule 210 §302.1b][County Rule 220 §304.1]

3) The Permittee shall burn LPG (liquefied petroleum gas) only as a fuel in wind machines 1-6.

[County Rule 241 §302][County Rule 210 §302.1b]

4) The four (4) gasoline-fired wind machines shall be permanently shut down. The use of these machines is prohibited.

[County Rule 240 §301]

20. MONITORING/RECORDKEEPING REQUIREMENTS:

A. Facility-Wide Requirements

1) Opacity

a) The Permittee shall log the following information for all visible emissions observations and Method 9 opacity readings required by this permit:

(1) The date and time the visible emissions observation or Method 9 opacity reading was taken;
(2) The name of the observer;
(3) Whether or not visible emissions were present;
(4) If visible emissions are present and the controls and facility processes are operating in a mode other than their normal operating conditions, such as startup or shutdown, a description of the operating conditions at the time that the opacity is observed;
(5) The opacity determined by a Method 9 opacity reading, if a Method 9 reading is required by these permit conditions;
(6) If applicable, a description of any corrective action(s) taken, including the date of such action(s); and
(7) Any other related information.

[County Rule 300] [County Rule 210 §302.1]

b) The Permittee shall weekly conduct a facility walk-through and observe visible emissions from any source capable of emitting any air contaminant to the ambient air, other than uncombined water.

[County Rule 300][County Rule 210 §302.1c]

c) If visible emissions, other than uncombined water, are observed being discharged into the ambient air, the Permittee shall monitor for compliance with the opacity standards specified in this permit by having a certified visible emissions evaluator determine the opacity of the visible emissions being discharged into the ambient air using the techniques specified in EPA Reference Method 9.

If the Permittee has not received either a compliance status notification or notice of violation regarding an opacity standard in the 12 months preceding the observation of visible emissions, the initial Method 9 opacity reading shall be taken within three days of observing visible emissions. If the Permittee has received either a compliance status notification or notice of violation regarding an opacity standard in the 12 months preceding the observation of emissions, the initial Method 9 opacity reading shall be taken within one day of observing visible emissions. If the emitting equipment is not operating on the day that the initial Method 9 opacity reading is required to be taken, then the initial Method 9 opacity reading shall be taken the next day that the emitting equipment is in operation. If the problem causing the visible emissions is corrected before the initial Method 9 opacity reading is required to be performed, and there are no visible emissions (excluding uncombined water) observed from the previously emitting equipment while the equipment is in normal operation, the Permittee shall not be required to conduct the Method 9 opacity readings.

Follow-up Method 9 opacity readings shall be performed by a certified visible emissions evaluator while the emitting equipment is in its standard mode of operation in accordance with the following schedule:

(1) Daily
   (a) Except as provided in paragraph 3 of this Permit Condition, a Method 9 opacity reading shall be conducted each day that the emitting equipment is operating until a minimum of 14 daily Method 9 readings have occurred.
   (b) If the Method 9 opacity readings required by this Permit Condition are less than 20% for 14 consecutive days, the frequency of Method 9 opacity readings may be decreased to weekly, in accordance with paragraph 2 of this Permit Condition.

(2) Weekly:
   (a) If the permittee has obtained 14 consecutive daily Method 9 readings which do not exceed 20% opacity, the frequency of Method 9 readings may be decreased to once per week for any week in which the equipment is operated.
   (b) If the opacity measured during a weekly Method 9 reading exceeds 20%, the frequency of Method 9 opacity readings

shall revert to daily, in accordance with paragraph 1 of this Permit Condition.

(c) If the opacity measured during the required weekly Method 9 readings never exceeds 20%, the Permittee shall continue to obtain weekly opacity readings until the requirements of paragraph 3 of this Permit Condition are met.

(3) Cease Follow-up Method 9 Opacity Monitoring:
Regardless of the applicable monitoring schedule, follow-up Method 9 opacity readings may cease if the emitting equipment, while in its standard mode of operation, has no visible emissions, other than uncombined water, during every observation taken during a Method 9 procedure.

[County Rule 210 §302.1c]

d) Opacity Readings

(1) Opacity shall be determined by observations of visible emissions conducted in accordance with 40 CFR Part 60 Appendix A, Method 9.

[40 CFR 60.11.b][County Rule 300 §501]

(2) Opacity of visible emissions from intermittent sources as defined by County Rule 300§201 shall be determined by observations conducted in accordance with 40 CFR Part 60 Appendix A, Method 9, except that at least 12 rather than 24 consecutive readings shall be required at 15-second intervals for the averaging time.

[County Rule 300§502] [locally enforceable only]

2) Odor Log

The Permittee shall maintain a log of complaints of odors detected off-site. The log shall contain a description of the complaint, date and time that the complaint was received, and if given, name and/or phone number of the complainant. The logbook shall describe what actions were performed to investigate the complaint, the results of the investigation, and any corrective actions that were taken.

[County Rule 210 §302.1.c.(2)] [locally enforceable only]

3) Monitoring/Recordkeeping for Compliance with Facility-Wide Emission Limits

The Permittee shall monitor for compliance with the emissions limits of Table 1 of these Permit Conditions by monthly calculating and recording the monthly and the rolling 12 month VOC emissions. The calculations shall be made no later than the 15th day of the following month. All VOCs in the materials used in the aerospace operations are assumed to be emitted into the atmosphere unless records acceptable to the Control Officer are kept documenting the quantity and VOC content of VOC containing materials disposed of off site. The Permittee shall maintain Certified Product Data Sheets, manufacturer supplied data, or test data from on-site sampling documenting the VOC content of all VOC containing materials used at the facility. The 12 month rolling emissions total shall be calculated by summing the emissions for the most recent complete 12 calendar months. Additionally, an 11 month rolling emissions total shall be calculated by summing the emissions for the most recent complete 11 calendar months. The monthly and rolling 12 month total emissions shall be calculated based upon one of the following two methods:

(1) If the 11 month rolling total of VOC emissions from the facility is less than 68.8 tons per year VOC, the Permittee shall calculate the operation's VOC emissions based on the material usage records for each month. The Permittee shall keep on site material usage records showing the volume of all VOC containing materials used each month.

(2) If the 11 month rolling total of VOC emissions reaches 68.8 tons per year VOC, the Permittee shall begin calculating the VOC emissions on a weekly basis to verify that the 12 month rolling limits are met. On a weekly basis, the Permittee shall calculate both:

(a) The weekly emissions from the previous week, and then
(b) The sum of the emissions from the last 11 months plus the emissions for the current month using all of the weekly calculations for the current month.

The above calculations shall be performed by the end of the following week. The Permittee shall utilize the results of the calculations in planning future activities to assure that the emission limits of Table 1 of these Permit Conditions are not exceeded.

[County Rule 210 §302.1c.]

B. Monitoring/Recordkeeping for Compliance with Goodrich Leased Operations Emission Limits

The Permittee shall monitor for compliance with the emissions limits of Table 2 of these Permit Conditions by monthly calculating and recording the monthly and the rolling 12 month VOC emissions. The calculations shall be made no later than the end of the following month unless a shorter time frame is specified elsewhere in these permit conditions. All VOCs in the materials used in the Goodrich Leased Operations are assumed to be emitted into the atmosphere unless records acceptable to the Control Officer are kept documenting the quantity and VOC content of VOC containing materials disposed of off site. The Permittee shall maintain Certified

Product Data Sheets, manufacturer supplied data, or test data from on-site sampling documenting the VOC content of all VOC containing materials used at Goodrich Leased. The 12 month rolling emissions total shall be calculated by summing the emissions for the most recent complete 12 calendar months. The monthly and rolling 12 month total emissions shall be calculated based upon one of the following two methods:

(1) If the 12 month rolling total of VOC emissions from Goodrich Leased is less than 18 tons per year, the Permittee shall calculate the operation's emissions based on the material usage records for each month. The Permittee shall keep on site material usage records showing the volume of all VOC and HAP containing materials used each month.

(2) If the 12 month rolling total of VOC emissions from Goodrich Leased reaches 18 tons per year, the Permittee shall begin calculating the VOC emissions from Goodrich Leased on a weekly basis to verify that the 12 month rolling limits are met. On a weekly basis, the Permittee shall calculate both:
   (a) The weekly emissions from the previous week, and then
   (b) The sum of the emissions from the last 11 months plus the emissions for the current month using all of the weekly calculations for the current month.

   The above calculations shall be performed by the end of the following week. The Permittee shall utilize the results of the calculations in planning future activities to assure that the emission limits of Table 2 of these Permit Conditions are not exceeded.

[County Rule 210 §302.1c.]

C. Monitoring/Recordkeeping for Compliance with Graphic Arts Emission Limits

The Permittee shall monitor for compliance with the VOC emission limits of Permit Condition 18.C. of this permit by monthly calculating the monthly VOC emissions from graphic arts and related coating operations and by yearly calculating the VOC emissions for the calendar year. The monthly calculations shall be made no later than the end of the following month unless a shorter time frame is specified elsewhere in these permit conditions. All VOCs in the materials used in the graphic arts operations are assumed to be emitted into the atmosphere unless records acceptable to the Control Officer are kept documenting the quantity and VOC content of VOC containing materials disposed of off site. The Permittee shall maintain Certified Product Data Sheets, manufacturer supplied data, or test data from on-site sampling documenting the VOC content of all VOC containing materials used in graphic arts operations at the facility. The monthly emission of VOC shall be calculated based upon one of the following two methods:

(1) If the monthly emissions of VOC from the graphic arts operations are less than 90% of the monthly emission limit, the Permittee may calculate the Graphic Arts Operations VOC emissions based upon the material usage records for

each month. The Permittee shall keep on site material usage records showing the volume of all VOC containing materials used each month.

(2) If the monthly emissions of VOC from the graphic arts operations reach 90% of the monthly emission limit, the Permittee shall begin to calculate VOC emissions on a weekly basis to verify that the monthly limit is met. On a weekly basis, the Permittee shall calculate both:

(a) The weekly emissions from the previous week, and then
(b) The sum of the emissions from (a) and the weeks prior to (a) in the month. The above calculations shall be performed by the end of the following week. The Permittee shall utilize the results of these calculations in planning future activities to assure that the monthly emissions limit of condition 18.C. of these Permit Conditions is not exceeded.

[County Rule 210 §302.1c]

D. Spray Paint Booth Requirements

1) Monitoring Requirements
a) The Permittee shall inspect each filter installed on a spray booth or enclosure, for gaps, sags or holes once per week.
(1) Should the Permittee observe any gaps, sags or holes in any of the filters, the Permittee shall immediately repair or replace the filter and record the name of the inspector, and the time and date that the filter was replaced.
(2) If no gaps, sags or holes are observed in any of the filters, the Permittee shall record the name of the inspector, and the time and date that the filter was inspected.

b) The Permittee shall inspect the facility for evidence of any spraying activity that occurred outside of the spray booth once per week.

[County Rule 210 §301.1.c.][locally enforceable only]

2) Record Keeping Requirements
a) The Permittee shall maintain on file and make available to the Control Officer upon request, a copy of the manufacturer's specifications verifying that the average overspray removal efficiency for the filter is at least 92%.

[County Rule 210 § 302.1.d]

b) The Permittee shall maintain on file and make available to the Control Officer upon request, a copy of the manufacturer's specifications verifying that the transfer efficiency for the spray gun or other approved application method is at least 65%.

[County Rule 210 § 302.1.d]

3) Monitoring/Recordkeeping for Compliance with Emission Limitations

a) The Permittee shall monitor for compliance with the emissions limits of Table 3 of these Permit Conditions by monthly calculating and recording the monthly, daily and rolling 12 month emissions of each pollutant listed in Table 3. The calculations shall be made no later than the end of the following month unless a shorter time frame is specified elsewhere in these permit conditions. Calculations shall be made according to the following:

(1) VOCs
All VOCs in the materials used in the Paint Booth are assumed to be emitted into the atmosphere unless records acceptable to the Control Officer are kept documenting the quantity and VOC content of VOC containing materials disposed of off site. The Permittee shall maintain Certified Product Data Sheets, manufacturer supplied data, or test data from on-site sampling documenting the VOC content of all VOC containing materials used in the Paint Booth. The Permittee shall keep a record of the total days on which surface coating operations were performed during the month. The 12 month rolling emissions shall be calculated by summing the emissions for the most recent complete 12 calendar months. The monthly, daily, and rolling 12 month total emissions of VOCs from the surface coating operations shall be calculated based upon one of the following two (2) methods.

(a) If the 12 month rolling total of VOC emissions is less than 1.5 tons, the Permittee may calculate the VOC emissions based upon the material usage records for each month. The Permittee shall keep on site material usage records showing the volume of all VOC containing materials used each month.

(b) If the 12 month rolling total of VOC emissions from the paint booth reaches 1.5 tons, or if the daily emissions of VOCs from the paint booth exceeds 20 lbs/day, the Permittee shall begin to record and use daily material usage to calculate VOC emissions. In addition, the Permittee shall begin to calculate the emissions on a weekly basis to verify that the 12 month rolling limits are met. On a weekly basis, the Permittee shall calculate both:

(1) The weekly emissions from the previous week, and then

(2) The sum of the emissions from the last 11 months plus the emissions for the current month using all of the weekly calculations for the current month. The above calculations shall be performed by the end of the following week. The Permittee shall utilize the results of the calculations in planning future activities to assure that the emission limits of Table 3 of these Permit Conditions are not exceeded.

(2) PM, PM_{10} and Antimony Oxide
For purposes of calculating particulate matter emissions,

transfer efficiency of the spray guns and average overspray removal efficiency of the filters shall not be higher than 65% and 92% respectively. The Permittee shall maintain an MSDS sheet or other similar documentation of the Solids Content and Non Volatile HAP content of all materials used in the Paint Booth. The 12 month rolling emissions shall be calculated by summing the emissions for the most recent complete 12 calendar months.

[County Rule 210 §302.1.c.(2)]

4) The Permittee shall keep a log demonstrating that all training requirements of these Permit Conditions are being met.

[County Rule 210 §302.1d]

E. Monitoring Requirements for Manufacturing Operations, Service Center, and Paint Booth

The following requirements apply to Manufacturing Operations (at Goodrich Existing and Goodrich Leased), Service Center, and the Paint Booth

1) Aerospace Operations

The Permittee using coatings listed in Tables 348a and 348b of these Permit Conditions or Section 301 of County Rule 348, shall maintain a current list of coatings in use, VOC content as applied and records of the monthly usage of such materials in pounds per gallon or grams per liter.

[County Rule 348 §501.1][SIP Rule 348 §501.1]

2) Graphic Arts Operations

The Permittee shall maintain a current list of inks, coatings, any other materials specified in County Rule 337 §503.1 used at the facility, and any other VOC-containing materials used at the facility; state the VOC content of each in lbs per gallon or grams per liter. Monthly, the Permittee shall update usage records showing the type and amount of graphic arts ink, coating, and other materials specified in County Rule 337 §503.2.

[County Rule 337 §503][SIP Rule 337 §503]

3) Other

The Permittee shall record the amount of all other VOC containing materials not otherwise accounted for under permit conditions 20.E.1and 2 above and 20.G.1 and 2, used at the facility at the end of each month for the previous month. Show the type and amount of each VOC containing material.

[County Rule 210 §302.1c.2]

4) Permit Shield

Compliance with the terms of this section shall be deemed compliance with the following applicable requirement(s) in effect on the date of permit issuance: County Rule 348 §501.1, SIP Rule 348 §501.1, County Rule 337 §503, and SIP Rule 337 §503.

[County Rule 210§407.1]

F. Service Center Monitoring Requirements

The Permittee shall monitor for compliance with the VOC emissions limit of Table 4 of these Permit Conditions by monthly calculating and recording the monthly and the rolling 12 month emissions of VOCs. The calculations shall be made no later than the end of the following month unless a shorter time frame is specified elsewhere in these permit conditions. All VOCs in the materials used in the Service Center Operations are assumed to be emitted into the atmosphere unless records acceptable to the Control Officer are kept documenting the quantity and VOC content of VOC containing materials disposed of off site. The Permittee shall maintain Certified Product Data Sheets, manufacturer supplied data, or test data from on-site sampling documenting the VOC content of all VOC containing materials used at the Service Center. The 12 month rolling emissions total shall be calculated by summing the emissions for the most recent complete 12 calendar months. The monthly and rolling 12 month total emissions of VOCs from the Service Center shall be calculated based upon one of the following two methods.

1) If the 12 month rolling total of VOC emissions from the Service Center is less than 90% of the Rolling 12-Month Emission Limit in Table 4, the Permittee may calculate the Service Center's emissions based upon the purchase records for each month. Under this scenario, it will be assumed that all VOCs are emitted during the month in which they were purchased. The Permittee shall

keep on site purchase records showing the volume of all VOC containing materials purchased.

2) If the 12 month rolling total of VOC reaches 90% of the Rolling 12-Month Emission Limit, the Permittee shall begin to record and use actual material usage to calculate VOC emissions from the Service Center. In addition, the Permittee shall begin calculating the emissions on a weekly basis to verify that the 12 month rolling limit is met. On a weekly basis, the Permittee shall calculate both:
   a) The weekly emissions from the previous week, and then
   b) The sum of the emissions from the last 11 months plus the emissions for the current month using all of the weekly calculations for the current month.

   The above calculations shall be performed by the end of the following week. The Permittee shall utilize the results of the calculations in planning future activities to assure that the emission limit of Table 4 of these Permit Conditions is not exceeded.

   [County Rule 210 §302.1c]

G. Solvent Cleaning Monitoring Requirements

1) Dip Cleaning

   a) The Permittee shall maintain a current list of cleaning-solvents; state the VOC-content of each in pounds VOC per gallon of material or grams per liter of material.
   b) The Permittee shall record the amount of cleaning-solvent used at the end of each month for the previous month. Show the type and amount of each make-up and all other cleaning-solvent.

   [County Rule 331 §501] [SIP Rule 331 §501]

2) Hand Wipe Cleaning

   a) The Permittee shall maintain a current list of all aqueous and semiaqueous hand-wipe cleaning solvents used with corresponding water contents.

   b) The Permittee shall maintain a current list of all vapor pressure compliant hand-wipe cleaning solvents in use with their respective vapor pressures or, for blended solvents, VOC composite vapor pressures and records of the monthly usage of such cleaning solvents.

   c) The Permittee shall maintain a current list of all hand-wipe cleaning processes using cleaning solvents with a vapor pressure greater than 45 mm Hg and records of the monthly usage of such cleaning solvents.

   [County Rule 348§501.2][SIP Rule 348§501.2]

3) Permit Shield

Compliance with the terms of this section shall be deemed compliance with the following applicable requirement(s) in effect on the date of permit issuance: County Rule 331 §501, SIP Rule 331 §501, County Rule 348 §501.2, and SIP Rule 348 §501.2.

[County Rule 210§407.1]

H. Spray Gun Cleaning Monitoring Requirements

1) Any person using an enclosed spray gun cleaner shall visually inspect the seals and all other potential sources of leaks at least once per month while the spray gun cleaner is in operation. Records of these inspections shall be kept and made available upon request by the Control Officer.

[County Rule 348§501.3][SIP Rule 348§501.3]

2) Permit Shield

Compliance with the terms of this section shall be deemed compliance with the following applicable requirement(s) in effect on the date of permit issuance: County Rule 348 §501.3 and SIP Rule 348 §501.3.

[County Rule 210§407.1]

I. Wind Machine Monitoring Requirements

The Permittee shall maintain records of the monthly operating hours of the wind machines. The Permittee shall monitor for compliance with the 12 month rolling hours limit of these Permit Conditions by monthly calculating and recording the monthly and the rolling 12 month hours total. The 12 month rolling hours total shall be calculated by summing the total hours the wind machines are in operation for the most recent complete 12 calendar months. The calculations shall be made no later than the end of the following month.

[County Rule 210 §302.1c(2)]

21. REPORTING REQUIREMENTS

The Permittee shall file semiannual monitoring reports with the Control Officer, Attn: Large Source Compliance Supervisor. The initial reporting period shall begin on the permit issuance date and shall cover a period of 6 months or less. The second and subsequent reporting periods shall be in 6 month intervals after the end of the initial reporting period. The semiannual monitoring reports shall be filed by the end of the month following the reporting period. Each report shall cover all instances of deviations from these permit conditions during the reporting period, the cause of the deviations if any were present, and any applicable corrective actions taken. The monitoring report shall also contain the following information at a minimum:

[County Rule 210 §302.1 e (1)]

A. Facility-Wide Requirements

1) Visible Emissions

The Permittee shall include the following in each semi-annual Compliance Report:

a) Dates on which visible emissions observations were taken;
b) Name of the observer;
c) Whether or not visible emissions were present;
d) The opacity of visual emissions determined by a Method 9 opacity reading, if applicable;
e) A description of any corrective actions taken, including the date such action was taken;
f) The name of individual certified as a visible emissions evaluator, the date of last certification, and company/agency providing the certification: and
g) Any other related information.

[County Rules 210§302.1][SIP Rule 30]

2) Odor Log

The Permittee shall include a copy of the portion of the odor log which covers the applicable 6 month reporting period in each of the semiannual compliance reports. If no complaints were received during the reporting period, a statement to that effect may be substituted for the copy of the odor log.

[County Rule 210 §302.1.e.(1)] [locally enforceable only]

3) The Permittee shall include the results of the monthly and the rolling 12-month emissions calculations for each month in the six-months reporting period. Additionally, the Permittee shall include the results of the rolling 11-month emissions calculations for each month in the six-months reporting period and the recordkeeping frequency for each calendar month.

[County Rule 210 §302.1e(1)]

B. Reporting Requirements for Goodrich Leased

The Permittee shall include the results of the monthly and the rolling 12-month emissions calculations for each month in the six-months reporting period applicable to the Goodrich Leased emission limit.

[County Rule 210 §302.1e(1)]

C Reporting Requirements for Graphic Arts Operations Emission Limits

The Permittee shall include the results of the monthly VOC emissions calculations for each month in the six-months reporting period and the annual VOC emission calculation(if it occurred during that six-months reporting period) applicable to the Graphic Arts Operations emission limit.

[County Rule 210 §302.1.e.(1)]

D. Reporting Requirements for Spray Paint Booth

1) The Permittee shall include the results of the monthly and the rolling 12-month VOC, PM, PM_{10}, and Antimony emissions calculations for each month in the six-months reporting period applicable to the spray paint booth emission limits. The Permittee shall also include any exceedances of the daily emission limits during the six-months reporting period.

[County Rule 210§302.1e]

2) The Permittee shall provide a summary of the training conducted in the applicable six-month reporting period. The summary shall include the dates that training was conducted, the names of employees that attended the training, and a list of activities that each employee was trained to perform.

[County Rule 210§302.1e]

3) For the purposes of the semi-annual compliance certification, the Permittee shall provide the following information:
   a) If the Permittee operates all spray coating equipment with a filtering system on a spray booth or enclosure with forced air exhaust, the Permittee shall provide a statement certifying the following:
      (1) That each filter installed on a spray booth or enclosure was inspected for gaps, sags or holes once every two weeks;
      (2) That all filters that were observed to have gaps, sags or holes were immediately replaced; and
      (3) Details of the make and manufacturer of each filter used as well as its overspray control efficiency.

4) The Permittee shall provide a statement certifying that no spraying occurred outside of the paint booths. This requirement shall not apply to spray coating exempted by Permit Condition 19.E.2 and County Rule 315§302. If evidence of spraying outside of the booth was found, the Permittee shall instead submit a statement detailing any corrective action taken in order to ensure that future spraying occurs inside the spray booth.

5) If the Permittee operates all spray coating equipment outside of a building and inside an enclosure without fixed air exhaust, the Permittee shall provide a statement certifying the following:
   a) That the enclosure has at least three sides that are a minimum of eight feet in height;
   b) That no spraying was conducted within three feet of any open end, or within two feet of any open top of the enclosure; and
   c) That the spray is directed in a horizontal or downward pointing manner for three-sided enclosures, or away from any opening for complete enclosures and three-sided enclosures with roofs.

   This requirement shall not apply to spray coating exempted by Permit Condition 19.E.2 and County Rule 315§302.

[County Rule 210 §302.1.e.][locally enforceable only]

E. Reporting Requirements for Manufacturing Operations, Service Center and the Paint Booth

The following requirements apply to the Manufacturing Operations (at Goodrich Existing and Goodrich Leased), Service Center and the Paint Booth:

1) Aerospace Operations

a) The Permittee shall include the list of coatings listed in Table 348a and Table 348b of this permit used in the six-months reporting period. Include the VOC content as applied in pounds per gallon or grams per liter.

b) The Permittee shall include the monthly usage of coatings listed in Table 348a and Table 348b of this permit in gallons or liters.

c) The Permittee shall include usage records in gallons per year to determine the exemption under Low usage coatings. Gallons per year shall be calculated for each of the six months in the reporting period based on a 12 month rolling sum.

[County Rule 210 §302.1.e.(1)]

2) Graphic Arts Operations

a) The Permittee shall include the list of inks, coatings, any other materials specified in County Rule 337§503.1 used at the facility, and any other VOC-containing materials used at the facility used in the six-months reporting period. Include the VOC content as applied in pounds per gallon or grams per liter.

b) The Permitee shall include the monthly usage of graphic arts ink, coating, and other materials specified in County Rule 337§503.2.

c) The Permittee shall submit notification of any exceedance of the 4200 lbs/month VOC threshold during the six month reporting period and the 25 TPY threshold if the calculation occurred during that six month reporting period.

[County Rule 210 §302.1.e.(1)]

F. Reporting Requirements for the Service Center

The Permittee shall include the results of the monthly and the rolling 12-month VOC emissions calculations for each month in the six-months reporting period applicable to the Service Center emission limit.

[County Rule 210 §302.1.e.(1)]

G. Reporting Requirements for Solvent Cleaning

1) Dip Cleaning

The Permittee shall include the following information in each semi-annual compliance report;

a) a summary of the listed cleaning-solvents currently used at the facility and state the VOC-content of each in pounds per gallon of material or grams per liter of material;

b) the quantity of each cleaning solvent used during the reporting period;

c) certify that monthly recordkeeping was performed as directed in the monitoring/recordkeeping requirements in Condition 20.H.1 of this permit; and

d) any new or updated material safety data sheets (MSDS) that may have been obtained during the period.

[County Rule 210 §302.1.e.(1)]

2) Hand Wipe Cleaning

The Permittee shall include the following in each semi-annual compliance report:

a) The Permittee shall include the list of all aqueous and semiaqueous hand-wipe cleaning solvents used with corresponding water contents used in the six-months reporting period.

b) The Permittee shall include the list of all vapor pressure compliant hand-wipe cleaning solvents in use during the six-months reporting period. Include their respective vapor pressures or, for blended solvents, VOC composite pressures.

c) The Permittee shall include the monthly usage of such vapor pressure compliant hand-wipe cleaning solvents in use during the six-months reporting period.

d) The Permittee shall include the list of all hand-wipe cleaning processes using cleaning solvents with a vapor pressure greater than 45 mm Hg in use during the six-months reporting period.

e) The Permittee shall include the monthly usage of such cleaning solvents with a vapor pressure greater than 45 mm Hg in use during the six-months reporting period.

[County Rule 210 §302.1.e.(1)]

H. Reporting Requirements for Spray Gun Cleaning

1) For purposes of the semi-annual compliance certification, the Permittee shall provide the following information:
The Permittee shall provide a statement certifying the following:

a) That inspections were performed on any enclosed spray gun cleaner and all other potential sources of leaks at least once per month.

b) Details of the make and manufacturer of each spray gun or other approved application method as well as the transfer efficiency for the spray gun or other approved application method.

[County Rule 210 §302.1.e.(1)]

I. Reporting Requirements for Wind Machines

The Permittee shall include the results of the monthly and the rolling 12-month operating hours calculations for each month in the six-months reporting period applicable to the wind machines operating hours limit.

[County Rule 210 §302.1.e.(1)]

22. OTHER REQUIREMENTS

A. Permit Shield

Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements identified in the portions of this permit subtitled "Permit Shield". The permit shield shall not apply to minor revisions to this permit allowed under County Rule 210, Section 405 and any facility changes without a permit revision allowed under County Rule 210, Section 403.1 and 403.2.

[County Rule 210§§302.4, 405.7, 403.1, 403.2 & 407]

B. MACT Standard

Goodrich Corporation Aircraft Interior Products is subject to 40 CFR 63 Subpart PPPP-National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products. The facility must comply with Subpart PPPP by the date 3 years after April 19, 2004. The facility must submit their Initial Notification in accordance with 40 CFR §63.4310 no later than the date 1 year after April 19, 2004.

Appendix A
Equipment/Activities List
V97007

ID No.	Name/Type	Control Device
A	Two (2) Electric Curing Ovens	NA
B	Adhesive Mixing/Chemical Storage and Disbursement Area	NA
C	Eleven (11) 1.25 MMBtu/hr Natural Gas Fired Space Heaters	NA
D	Existing Production Lines originally permitted under operating permit number 870082 consisting of: 1. Slide/Raft Production Lines 2. Miscellaneous Products a. Liferaft line (Aviation) b. Packboard Line c. Spares and Kitting Line d. Prototype Research and Development e. Materials Testing	NA
E	Miscellaneous Equipment/Processes including waste rag drum compactor, silk screen ink marking, touch up painting by brush	NA
F	22'X36' x 9' Paint Booth with 2 stacks 34" in Diameter	NA
G	VWR Scientific VF5001 14-SN Materials Lab Hood	NA
H	Service Center	NA
I	Six (6) LPG fired wind machines	NA
J	Slide/Raft Operations at 3425 S. 5th Street (Goodrich Leased) 1 Fabric gluing, stenciling, handbrush painting 2. Prototype Research and Development	NA

Technical Support Document (TSD)
Goodrich Corporation Aircraft Interior Products
Permit Number V97-007

I. COMPANY DESCRIPTION

Goodrich Corporation Aircraft Interior Products located in Phoenix, Arizona manufactures evacuation slides and slide/rafts for commercial aircraft. The facility began operation in 1986. Goodrich Corporation submitted an initial Title V application on 9/24/97. An application addendum to update the application was submitted 9/12/02. Additional information for the Title V application was received on January 22, 2003. Additional Information was received on 3/14/03. A supplement to correct the application was received on October 3, 2003. The existing operating permit number is 8700082.

II. APPLICABLE REQUIREMENTS

Facility-Wide Requirements

A. County Rule 300 – Opacity Limits (**Permit Condition 18.A**)

1. Discussion

County Rule 300 restricts visible emissions from any source to 20% opacity other than emissions of uncombined water. County Rule 300 and the 20% opacity limitation of these permit conditions are locally enforceable only. SIP Rule 30 and the 40% opacity limitation of these permit conditions are federally enforceable.

2. Monitoring for Compliance with Opacity Limits

Because particulate matter emissions from the Spray Paint Booth are limited by County Rule 315 which requires filters with average overspray removal efficiency of at least 92%, Visible emissions are not expected from this facility. The Permittee will monitor for compliance with the opacity requirements of this permit by performing a weekly facility walk-through, looking for visible emissions from any source capable of visible emissions other than uncombined water. **(Permit Condition 20.A.1.b))**. An important part of this inspection should be the spray paint booth stacks. This requirement is intended to regulate the opacity from sources that vent outdoors.

If emissions are observed, and the Permittee has not had an opacity violation in the 12 months preceding the observation, then the Permittee is required to obtain an EPA Method 9 reading by a certified reader within 3 days of the observation. However, if the Permittee takes corrective action and the visible emissions are eliminated before the end of the third day, or if the emissions do not persist and no problem can be identified, the Method 9 reading will not be required. The Permittee is required to document any corrective action taken to reduce or eliminate emissions. If the Permittee has had an occurrence of

visible emissions with an opacity of greater than 20%, at any time in the 12 month period preceding the observation, then a certified Method 9 reading is required within one day of the observation **(Permit Condition 20.A.1. c)).** Followup readings shall be conducted daily until a minimum of 14 daily readings have occurred. 14 consecutive days of opacity readings of less than 20% will reduce the frequency of readings to weekly. A reading of greater than 20% during a weekly Method 9 reading will cause the frequency of readings to go back to daily. If during daily or weekly monitoring, no visible emissions occur during every Method 9 reading, followup readings may cease.

A certified Method 9 reading of greater than 20% opacity at any time constitutes a violation of the opacity limitations of the Permit, regardless of whether visible emissions have persisted for three subsequent days.

B. County Rule 320 – Odors and Gaseous Air Contaminants (**Permit Conditions 18.A.2**), **19.A. 1) , and 19.A.2))**

1. Discussion

County Rule 320 §300, 302, and 303, entitled "Standards", "Material Containment Required" and "Reasonable Stack Height Required", respectively, apply to this facility and have been incorporated into the permit conditions. Permit conditions based on County Rule 320 §300 are locally enforceable only.

2. Monitoring for Compliance with Rule 320 Limitations

To monitor for compliance with these requirements, the Permittee is required **(Permit Condition 20.A.2))** to maintain an odor complaint log containing a description of the complaint, date, time and other information and submit a copy of this log with the semi-annual monitoring report **(Permit Condition 21.A.2))**.

C. **Facility-Wide** Emission Limits **(Permit Condition 18.A.4)**

Table 1: Facility-Wide Emission Limits

Pollutant	Monthly emission limit	* Rolling 12-Month Emission Limit
Total Volatile Organic Compounds (VOCs)	23000 lbs/month	80.3 tons per year

* The rolling twelve-month emissions shall be calculated by summing the total emissions over the most recent twelve calendar months.

1. Discussion

VOC emission limits were placed on the facility to ensure that the addition of operations at 3425 South 5th Street (Goodrich Leased) will not exceed the New Source Review (NSR) Threshold (County Rule 240) of 25 tons per year net increase. This is the threshold for VOC emissions above which a modification is considered a major modification and has to go through NSR in a serious or severe nonattainment area. The addition of operations at 3425 South 5th Street (Goodrich Leased) was made for the production of additional slides as a result of the closure of a slide plant in Spencer, West Virginia. The facility exported their largest line of 737 slides to India prior to manufacture of these new slides. New equipment some of which was brought over from the plant in West Virginia, includes paintbrushes, small electric pumps, hand tools for spares work, an auto-cutting machine, tables and sewing machines. Toluene and MEK constitute the majority of HAPs from this project. Raw materials include Toluene, MEK, Isopropanol, solvents, adhesives, primer, paints, and inks. A complete description of the slide manufacturing process can be found in the file.

An aggregating analysis was performed as follows:

Section 307 of Rule 240 requires an aggregating exercise be performed for a physical change or change in the method of operation that results in an increase of > 1 tons per year. An aggregating analysis was submitted and reviewed. The results are as follows:

Project Net = 52.86 TPY(import of Spencer lines)

Contemporaneous Net
1998 0 tons
1999 0 tons
2000 0.2 tons (addition of wind test engines)
2001 3.0 tons (service center addition under minor mod. 7-20-01. VOC

increase based on permit allowable)

2002 - 38.25 TPY(export of 737 lines) (decrease is not creditable)
total 3.2 TPY

Net emissions increase = 52.86 tons per year + 3.2 = 56.1. Therefore the change would be over the significance level. However, the source will agree to take a facility-wide limit to ensure that this modification does not exceed the NSR/PSD threshold of 25 tons/yr of VOC.

The exceedance level was set at 24.9 TPY and the limit calculated as follows:

$(\text{Future Potential}_{\text{facility}} - \text{Past Actuals}_{\text{facility}}) + 3\ \text{TPY}_{\text{service center addition}} + 0.2\ \text{TPY}_{\text{wind machines}} = 24.9\ \text{TPY}$

$\text{Future Potential}_{\text{facility}} = 24.9 + (60 + 57.1)/2)_{2000/2001\ \text{ave}} - 3.2 = 80.3\ \text{TPY}$ (new allowable)

2001 actual emissions from Emissions Inventory Report - VOC = 60 TPY
2000 actual emissions from Emissions Inventory Report - VOC = 57.132 TPY
2000/2001 avg. – VOC = 58.6 TPY

The monthly emission limit was set at 23,000 lbs/month (11.5 tons) to allow for occasional fluctuations in emissions. The facility may have a higher emissions month followed by a lower emissions month. For example 19,000 lbs one month and 8,000 lbs the next.

2. County Rule 210 §302.1c(2) - Monitoring for Compliance with VOC Emission Limits

   County Rule 210 §302.1c(2) is cited as the basis for monitoring when the applicable requirement does not specify monitoring and the Department has to develop monitoring and recordkeeping.

The Permittee is required to monitor for compliance with the Facility-Wide VOC emission limits by calculating and recording the monthly and rolling 12 month totals of VOC each month. Calculations are required to be performed by the 15th day of the following month. Additionally, a rolling 11 month total will be calculated each month. VOC emissions will be calculated based on material usage records of VOC containing materials used at the facility each month. All VOCs in VOC containing materials will be assumed to be emitted unless disposal records acceptable to the Control Officer are kept. Should the 11 month rolling total of VOC emissions reach 68.8 tons per year , the Permittee shall begin calculating weekly emissions and the 12 month rolling total on a weekly basis.

D. Goodrich Leased Emission Limits (Permit Condition 18.B.)

Table 2: VOC Emission Limits applicable to Goodrich Leased

Pollutant	Monthly emission limit	* Rolling 12-Month Emission Limit
Total Volatile Organic Compounds (VOCs)	4000 lbs/month	20 tons per year

*The rolling twelve-month emissions shall be calculated by summing the total emissions over the most recent twelve calendar months.

[County Rule 210 §302.1b]

1. Discussion

VOC emission limits were also placed on Slide/Raft Operations at 3425 South 5th Street (Goodrich Leased) to ensure that the project discussed under Section C.1 of this technical support document will not exceed the New Source Review (NSR) Threshold (County Rule 240) of 25 tons per year net increase. This VOC limit is consistent with the public noticed limits. Goodrich Corporation Aircraft Interior Products requested a VOC limit of 20 TPY on Manufacturing Operations at Goodrich Leased in Title V supplement letter dated 10/03/03.

2. County Rule 210 §302.1c(2) - Monitoring for Compliance with VOC Emission Limits

The Permittee is required to monitor for compliance with the Goodrich Leased VOC emission limits by calculating and recording the monthly and rolling 12 month totals of VOCs each month. VOC emissions will be calculated based on material usage records of VOC containing materials used at the facility each month. All VOCs in VOC containing materials will be assumed to be emitted unless disposal records acceptable to the Control Officer are kept. Should the VOC emissions reach 18 tpy of the rolling 12-month limit, the Permittee must begin calculating weekly emissions and the 12 month rolling total on a weekly basis.

E. County Rule 337 – Emission Limits on Graphic Arts Operations **(Permit Condition 18.C.)**

1.) Discussion

a) VOC Emission Limit

County Rule 337 - Graphic Arts applies because some parts may be silk-screened or stenciled with various ink markings. No printing presses are on site, however. The entire facility is subject to a partial exemption from Rule 337 based on Section 306.1 of the Rule because VOC < 25 tons per calendar year and 4200 lbs/month from graphic arts

activities at the entire facility. As long as VOC emissions are less than these thresholds, only recordkeeping requirements from Rule 337 apply. The source will be limited to < 25 tons per calendar year and 4200 lbs/month. This 25 tons is not over and above the Goodrich Facility-Wide limit of 80.3 tons per year. The emissions from these activities (graphic arts) still count toward this limit.

b) VOC Containment And Disposal

All VOC-containing material used for cleaning and cleanup, including rags and towels, shall be stored in closed containers when not in use.

2.) County Rule 210 §302.1c(2) and County Rule 337 Monitoring Requirements

The Permittee is required to monitor for compliance with VOC emission limits by calculating and recording the monthly VOC emissions and by yearly calculating the VOC emissions for the calendar year from the Graphic Arts Operations. VOC emissions shall be calculated based on material usage records of VOC containing materials used in the Graphic Arts Operations each month. All VOCs in VOC containing materials used in the Graphic Arts Operations are assumed to be emitted into the atmosphere unless disposal records acceptable to the Control Officer are kept. Should emissions reach 90% of the monthly emission limit, the Permittee shall calculate on a weekly basis, the weekly emissions from the previous week and the sum of all the weeks emissions prior to the previous week in that month.

The Permittee is required to keep a current list of inks, coatings, other materials specified in County Rule 337 §503.1, and any other VOC-containing materials used at the facility. State the VOC content of each. Monthly update usage records showing type and amount of graphic arts ink, coating, and other materials specified in County Rule 337 §503.2. (**Permit Condition 20.D.2)**)

F. County Rule 348 – Aerospace Manufacturing and Rework Operations

1. Discussion

a) VOC Content Limitation

County Rule 348 limits the VOC content of Primers, Topcoats, and Specialty Coatings applied to aerospace components (slide/rafts are considered components) as follows:

Table 348a:

PRIMER or TOPCOAT TYPE	VOC LIMITS (g/L)
All Primers (except Specialty or General Aviation Rework Facility Primers)	350 g/l
All Topcoats (except Specialty or General Aviation Rework Facility Topcoats)	420 g/l
General Aviation Rework Facility Primers	540 g/l
General Aviation Rework Facility Topcoats	540 g/l

Table 348b:

Type of Specialty Coating	VOC Limits (g/L)
Ablative Coating	600
Adhesion Promoter	890
Adhesive Bonding Primers: Cured at 250°F or below	850
Adhesive Bonding Primers: Cured above 250°F	1030
Adhesives: Commercial Interior	760
Adhesives: Cyanoacrylate	1,020
Adhesives: Fuel Tank	620
Adhesives: Nonstructural	360
Adhesives: Rocket Motor Bonding	890
Adhesives: Rubber-based	850
Adhesives: Structural Autoclavable	60
Adhesives: Structural Nonautoclavable	850
Antichafe Coating	660
Bearing Coating Compounds	620
Caulking and Smoothing Compounds	850
Chemical Agent-Resistant Coating	550
Clear Coating	720
Commercial Exterior Aerodynamic Structure Primer	350
Compatible Substrate Primer	350
Corrosion Prevention Compound	710
Cryogenic Flexible Primer	350
Cryoprotective Coating	600
Coatings Related To Electromagnetism And/Or Other Radiation Electric Or Radiation-Effect Coating	600
Electrostatic Discharge and Electromagnetic Interference (EMI) Coating	800
Elevated Temperature Skydrol Resistant Commercial Primer	350
Epoxy Polyamide Topcoat	420
Fire-Resistant (Interior) Coating	800
Flexible Primer	350
Flight-Test Coatings: Missile or Single Use Aircraft	420
Flight-Test Coatings: All Other	840
Fuel-Tank Coating	720
High-Temperature Coating	850
Insulation Covering	740
Intermediate Release Coating	750
Lacquer	830
Maskant: Bonding Maskant	420
Maskant: Critical Use and Line Sealer Maskant	420
Maskant: Seal Coat Maskant	420
Metallized Epoxy Coating	740
Mold Release	780
Optical Anti-Reflective Coating	750
Part Marking Coating	850

Pretreatment Coating	780
Rain Erosion-Resistant Coating	420
Resin Surface Sealer	695
Rocket Motor Nozzle Coating	660
Scale Inhibitor	880
Screen Print Ink	840
Sealants: Extrudable/Rollable/Brushable Sealant	240
Sealants: Sprayable Sealant	600
Self-priming Topcoat	420
Silicone Insulation Material	850
Solid Film Lubricant	880
Specialized Function Coating	890
Temporary Protective Coating	250
Thermal Control Coating	800
Wet Fastener Installation Coating	675
Wing Coating	420

Low usage coatings used in separate formulations in volumes of less than 50 gallons per year facility-wide with a maximum exemption of 200 gallons total for such formulations are exempt from the VOC limits set forth in Tables 348a and 348b (**Permit Condition 19.B 2) (5))).** The facility uses inks that do exceed the VOC content limitations but they are below the 50 and 200 gal threshold and so are exempt.

b) Application Equipment: **(Permit Condition 19.B.3))**

The Permittee shall use one of a number of application techniques in applying any primer or topcoat to aerospace components unless another coating application method that can demonstrate and can be approved by the Control Officer as having at least a 65% transfer efficiency, which is equivalent to the transfer efficiency of HVLP or electrostatic spray application methods.

The facility meets the above requirement. The facility applies primer or topcoat applications with hand brushes or small Q-tip type applicators. The spray booth uses HVLP spray guns and therefore is considered to meet the 65% transfer efficiency.

c) VOC Containment and Disposal **(Permit Condition 19.B.4)**
The Permittee shall keep all fresh and used VOC containing materials such as cleaning solvents, coatings, thinners, rags, and their residues in closed, leak free, legibly labeled containers when not in use. Handling and transfer procedures must be implemented during filling and transferring the cleaning solvent to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh or used cleaning solvents. Cotton tipped swabs used for very small cleaning operations and aqueous cleaning solvents are exempt from this requirement.

d) Hand Wipe Cleaning **(Permit Condition 19.C.2)**

Cleaning solvents used in hand-wipe cleaning operations shall use an aqueous cleaning solvent, or have a VOC composite vapor pressure less than or equal to 45 mm Hg at 20 °C

Cleaning and surface activation prior to adhesive bonding is not subject to the above requirement in accordance with County Rule 348§308.3.

e) Spray Gun Cleaning

Permit Condition 19.D specifies the methods that the spray guns must be cleaned by. Enclosed spray gun cleaning systems may be used. Goodrich states in its 1/22/03 Title V additional information that it uses a "commercially –available" type enclosed cleaner to clean spray guns used to apply water-based paints. Enclosed spray gun cleaning systems shall be kept closed when not in use and leaks must be repaired within 14 days from when the leak is first discovered. If the leak is not repaired by the 15th day after detection, the solvent shall be removed and the enclosed cleaner shall be shut down until the leak is repaired or its use is permanently discontinued.

f) Application Equipment

The Permittee shall maintain on file and make available upon request, a copy of the manufacturer's specifications verifying the transfer efficiency of the spray guns or other approved application method is at least 65%. HVLP is considered to meet this requirement for the spray guns.

2. Monitoring for Compliance

a) VOC Content Limitations **(Permit Condition 20.D.1))**
The facility shall monitor for compliance with these limits by maintaining a current list of coatings in use, VOC content as applied and records of the monthly usage of such materials in pounds per gallon or grams per liter.

b) Hand Wipe Cleaning **(Permit Condition 20.F.2)**
The Permittee shall maintain current lists of 1) all aqueous and semiaqueous hand-wipe cleaning solvents with corresponding water contents, 2) all vapor pressure compliant hand-wipe cleaning solvents in use with their respective vapor pressures or, for blended solvents, VOC composite vapor pressures and records of the monthly usage of such cleaning solvents and 3) all hand-wipe cleaning processes using cleaning solvents with a vapor pressure greater than 45 mm Hg and records of the monthly usage of such cleaning solvents.

c) Spray Gun Cleaning **(Permit Condition 20.H.)**

Monthly inspect the seals and all other potential leak sources. Keep records of these inspections and make available upon request by the Control Officer.

G. County Rule 315 **(Permit Condition 19.E.)**

The permit conditions associated with County Rule 315 – Spray Coating, discussed below are locally enforceable only.

1. Discussion
   a) Spray Coating Outside Buildings inside Enclosures **(Permit Condition 19.E.1)b))**
   Goodrich does not conduct Spray Coating outside of buildings.
   b) Spray Coating with Forced Air Exhaust **(Permit Condition 19.E.1)a))**
   For spray coating with forced air exhaust, County Rule 315 and the Permit require the use of a filtering system with an average overspray removal efficiency of 92% by weight. The Permit also requires that there be no gaps, sags or holes in the filters and that all exhaust is discharged to the atmosphere. Additional Information for the Title V application shows that the paint booth filters have average overspray removal efficiency of 98.66%. This is supported by the manufacturers info. The facility states that the filters have an average overspray removal efficiency of 96.5%.

2. Monitoring for Compliance
   a) Monitoring for Compliance: Spray Coating with Forced Air Exhaust **(Permit Condition 20.C.)**
   According to information provided and the manufacturer's info, the paint booth filters have average overspray removal efficiency of > 92%. To monitor for compliance with the requirements for spray booths with forced air exhaust, Goodrich will continue to maintain information indicating the removal efficiency of the paint booth filters on site. An inspection of the filters for gaps, sags, or holes is required on the paint booth once per week. Goodrich shall record the results of the inspection.

H. County Rule 331 - Solvent Cleaning(**Permit Condition 19.C.**)

1. Discussion
   The facility does conduct dip cleaning which is regulated by this rule. Hand wipe cleaning is covered by County Rule 348 and exempt from Rule 331 by Rule 348§308.1c.(2)). The facility has a small dip cleaner using Isopropyl Alcohol with a liquid surface area < 1 ft^2. Also, in the original Title V application it states that cans with capacity < 1 gal are used for cleaning. These equipment fall under the partial exemption provided by 331§308.2b which exempts them from from 331 §303 - §307.

   All cleaning solvent, including solvent soaked materials, are to be kept in closed leakfree containers to be opened only when adding or removing materials. Each container shall be clearly labeled with its contents. If any cleaning solvent escapes from a container, wipe up or otherwise remove

immediately if in accessible areas and for areas where access is not feasible during normal production, remove as soon as reasonably possible. Unless records show that VOC-containing material was sent offsite for legal disposal, it is assumed that it evaporated on site.

For the dip tank and cans, they must be leakfree and the VOC-containment portion impervious to VOC-containing liquid and vapors.

2. Monitoring for Compliance **(Permit Condition 20.F.)**
The Permittee shall maintain a current list of cleaning-solvents which states VOC content of each in either lbs/gal or g/l. Record the amount of cleaning solvent used each month showing type and amount.

I. Spray Paint Booth Emission Limits from Significant Permit Revision Number S96-001 (**Permit Condition 18.C.**)

Table 3: Paint Booth Emission Limits

	Daily Emission Limits (lbs/day)	*Twelve Month Rolling Average Emission Limits
Volatile Organic Compounds (VOCs)	20.0 lbs/day	2.0 TPY
Total Particulates	2.2 lbs/day	400.0 lbs/yr
PM_{10}	2.2 lbs/day	400.0 lbs/yr
Antimony Oxide	0.8 lb/day	150.0 lbs/yr

* The twelve month rolling average shall be calculated by summing the total emissions from the Paint Booth over the most recent twelve calendar months.

1. Discussion
   a) VOC, PM, PM_{10}, and Antimony Oxide Emission Limits
   The rolling 12-month and daily emission limits of V97-007 for the paint booth remain the same as previously permitted limits (Significant Permit Revision Number S96-001) for this source. The basis for the emission limits was based on a RACT determination made at that time (County Rule 241 §302 RACT(Reasonably Available Control Technology)). The previous limit for Nonprecursor Compounds was removed for purposes of the Title V permit because it is no longer regulated by Rule 241. The limit for Triethylamine was also removed. In correspondence dated 10/23/03, the facility stated that they ceased using this material 5 years prior and have no plans to use it in the future.

   b) Monitoring for Compliance with Paint Booth Emission Limits
   The Permittee is required to monitor for compliance with these emission limits by monthly calculating and recording the daily, monthly and rolling 12 month totals of VOCs, Antimony Oxide, PM, and PM_{10} each month (**Permit Condition 20.C.3**). VOC and HAP emissions shall be calculated based on material usage records of VOC and HAP containing materials used in the Paint Booth each month. All VOCs in VOC containing materials used in the Paint Booth are assumed to be emitted

into the atmosphere unless disposal records acceptable to the Control Officer are kept. If, in any month, the rolling 12 month VOC calculation reaches 1.5 tons or if the daily emissions of VOCs exceeds 20 lbs/day, the Permittee must begin calculating weekly emissions and the 12 month rolling total on a weekly basis.

Until the daily VOC emissions exceed 20 lbs/day, the daily emission rate may be calculated by dividing the monthly emission rate by the number of operating days. Actual daily usage will be recorded and used to calculate paint booth emissions if VOC exceeds 20 lbs/day or 1.5 tons/yr.

PM, PM_{10}, and Antimony Oxide emissions shall be calculated by using a spray gun transfer efficiency not higher than 65% and an average overspray removal efficiency of the filters of not higher than 92%. The Permittee shall maintain an MSDS sheet or other similar documentation of the Solids Content and Antimony Oxide content of all materials used in the Paint Booth. The 12 month rolling emissions shall be calculated by summing the emissions over the most recent complete 12 calendar months.

J. Service Center Emission Limits from Minor Permit Revision 8-2-01-07 (**Permit Condition 18.D**)

Table 3: Emission Limits applicable to the Service Center Operation

Pollutant	* Rolling 12-Month Emission Limit
Total Volatile Organic Compounds (VOCs)	3 tons

* The rolling twelve month emissions shall be calculated by summing the total emissions over the most recent twelve calendar months.

[County Rule 210 §302.1b]

1. Discussion
   VOC Emission Limit
   The Rolling 12-month emission limit for the Service Center is the same amount as previously permitted limit (Minor Permit Revision 8-2-01-07). This is a voluntarily accepted limit by the facility.

2. Monitoring for Compliance with Service Center VOC limits
   The Permittee is required to monitor for compliance with these emission limits by calculating and recording the monthly and rolling 12 month totals of VOCs from the Service Center Operations each month (**Permit Condition 20.E**). VOC emissions shall be calculated based on purchase records of VOC containing materials used in the Service Center each month. This is the accepted method of monitoring from the minor permit revision under which the Service Center was permitted. All VOCs in VOC containing materials purchased in a month will be assumed to be used that month, unless disposal records acceptable to the Control Officer are kept. Should the VOC emissions reach 90% of the rolling 12-month limit, the Permittee shall begin to record and use actual material usage to calculate emissions. In addition, the Permittee shall begin calculating weekly emissions and the 12 month rolling total on a weekly basis.

K. Wind Machine Requirements **(Permit Condition 19.F.)**

1. Discussion
The Permittee is required to install 3-way catalytic converters with minimum 80% control efficiency for CO, NOx and VOC on the wind machines. These have been installed. This requirement is to satisfy RACT requirements. The Permittee may only burn LPG as a fuel in the wind machines. This requirement is to satisfy RACT requirements. The Permittee is limited to operating 600 machine-hour annually for the entire array of wind machines based on a 12 month rolling total. This requirement is so that the Permittee can avoid having to perform an aggregating analysis. The Permittee replaced four gasoline fired wind machines with six LPG fired units. The Permittee must permanently shut down the 4 gasoline fired machines. These units have been moved offsite.

Monitoring for Compliance.
The Permittee must maintain records of the monthly operating hours of the wind machines. The Permittee shall calculate monthly, the rolling 12 month hours total.

III. NON-APPLICABLE REGULATIONS

40 CFR 63 Subpart GG – National Emission Standards for Aerospace Manufacturing and Rework Facilities – This was determined not to be applicable to Goodrich because according to §63.741, the requirements of this Subpart "do not apply to parts and assemblies not critical to the vehicle's structural integrity or flight performance". Evacuation slides and liferafts clearly are not critical to the aircrafts structural integrity or flight performance. A condition of significant permit revision S96-001 for the paint booth did not allow surface coating on "aerospace parts and assemblies critical to the vehicle's structural integrity or flight performance". This condition was retained for the Title V permit (**Permit Condition 18.D.2)**) but altered slightly to make it clearer.

Section 112 g of the Federal Clean Air Act– This is the portion of 40 CFR 63 that applies to construction or reconstruction of new major sources of HAPs (> 10/25 TPY HAPs) that are constructed before EPA issues a MACT for that facility type. A MACT Standard has been issued for this facility (40 CFR 63 Subpart PPPP promulgated April 19, 2004). However the addition of Goodrich Leased was prior to the promulgation date of the MACT Standard and so 112 (g) must be considered as a possible applicable requirement for the new equipment installed under that modification. The project was not a reconstruction because components were not replaced. This project does not meet the definition for a "Greenfield" Facility. The project **is** addition of equipment at an existing facility and it emits major amounts of HAPs (> 10/25 TPY) by itself. Therefore a determination must be made of whether that addition of equipment constitutes a new "process or production unit". From the preamble for this rule, the key questions are:

1) What are the intermediate or final products?
The company claims that there are no intermediate products. The Department concurs, as there does not appear to be a market for incomplete slides and slide/rafts. The final products are determined to be the completed slides.

2) Do the new equipment and/or structures constitute a collection of equipment and/or structures that produces such a product?

No, the facility relies on new **and** existing equipment and/or structures to complete the final product. New equipment, some of which was brought over from the plant in West Virginia, includes paintbrushes, small electric pumps, hand tools for spares work, an auto-cutting machine, tables and sewing machines. In addition, employees were added to accommodate the increased workload. The new auto cutting machine was added although the existing auto cutters and hand cutters already had the capability to cut all the fabric. This was being done while the new auto cutting machine was nonoperational for several months. Small parts needed to complete the slide such as hand-sewn straps, fabric covers, round fabric patches, attachment anchors with grommet points, etc. are assembled in the Spares Department. The hand tools brought in from West Virginia are some of the items used by the new employees to accommodate the new workload. However, the manual grommet presses and hot-knifes needed are existing items that are also used. Therefore, activities in the leased space depend on existing equipment and existing activities to provide Spares Work for example. An assortment of inflation hardware is assembled and tested prior to incorporation into the product. This includes compressed gas bottles which are filled and tested, inflation hoses and aspirator hardware which are certified to FAA and Department of Transportation specifications, put into a kit and incorporated into the product. No new inflation equipment, bottle charging or hardware processing equipment was added with this project. Therefore, activities in the leased space depend on existing equipment and existing activities to provide the Inflation Hardware Operations, for example.

In conclusion the new equipment and/or structures does not constitute a collection of equipment and/or structures that produces the product.

Therefore, a new process or production unit has not been added that would be able to independently produce the product and so it has been determined that Section 112 g does not apply.

For more information on the above please see the June 4, 2004 correspondence from Randy Cooper, P.E. (facility's consultant), October 21, 2002 letter from Goodrich, and October 11, 2002 letter from Randy Cooper.

County Rule 330 - Volatile Organic Compounds - no longer applies to this facility in accordance with Section 307.2 since it has been determined that Rule 348 now applies.

County Rule 336 - Surface Coating Operations - no longer applies to this facility in accordance with Section 305.1 since it has been determined that Rule 348 now applies.

Compliance Assurance Monitoring (CAM) (40 CFR 64)
Goodrich does not use a control device to achieve compliance with any emission limitation or standard for a pollutant for which the source has potential pre-control device emissions greater than or equal to major source levels for that pollutant. Therefore, CAM does not apply to this facility.

40 CFR Part 63 Subpart OOOO – National Emission Standards for Fabric Printing, Coating, & Dyeing Surface Coating Operations

This regulation was promulgated on 5/29/03. §63.4281 of the Subpart states that this Subpart applies to 3 subcategories, § 63.4281 (a)(1), (a)(2), and (a)(3). Goodrich does not conduct *Slashing*, *Dyeing* and *Finishing* in accordance with §63.4371. §63.4281(a)(1) refers to the definition of *Coating operation* and *Printing operation*. The definition of *Coating operation* describes applying coating material to a web substrate. Goodrich buys a fabric that has already been webcoated. Once Goodrich gets the fabric, they cut it so that it may no longer a web substrate. Adhesive is added to the cut fabric but only to the seam edges. For this reason, adhesive application does not fall under the definition of *Coating* in §63.4371 because it does not form a continuous solid film. Goodrich conducts stenciling with screen printing (not a press) on the slides after they are built. Once the slide has been built, it is considered a discrete part and not a web substrate. The definition of *Printing operation* describes the application of printing material to a web substrate. Therefore, Goodrich application of printing materials does not constitute Printing in accordance with §63.4371. Heat resistant material is applied to intact slides (discrete parts) by hand and to intact slides (discrete parts) with spray guns. The intact slides are not considered web substrates and therefore, the hand application and spray coating of heat resistant material are not considered Coating operations for this rule. Therefore, 40 CFR 63 Subpart OOOO does not apply to Goodrich.

40 CFR Part 63 Subpart JJJJ – National Emission Standards for Paper and Other Web Coating – **This Subpart does not apply to Goodrich because Goodrich does not have any web coating lines as defined in §63.3310. See above discussion.**

40 CFR 63 Subpart EEEE – Organic Liquids Distribution (Non-Gasoline) NESHAP – This subpart does not apply to Goodrich. Goodrich total organic liquid throughput is roughly 25,000 to 50,000 gallons per year. These amounts are less than 1% of the throughput applicability of 7.92 million gallons per year for this rule.

40 CFR 63 Subpart T – Halogenated Solvent Cleaning NESHAP – This subpart does not apply to Goodrich because halogenated solvents as defined in §63.460(a) are not used at the facility.

40 CFR 60 Subpart VVV – Standards of Performance for Polymeric Coating of Supporting Substrates – This standard does not apply because Goodrich does not coat a continuous web in accordance with Subpart VVV.

IV. MACT STANDARD

40 CFR 63 - MACT standards, Subpart PPPP, Surface Coating of Plastic Part and Products - This rule applies to this facility. It was promulgated April 29, 2004. A statement of applicability with the future compliance date was included in the permit. The future compliance date is 3 years from the date of promulgation The permit may be reopened prior to its renewal to add the MACT requirements in the future.

V. MODELING

SCREEN3 Modeling was performed for Toluene, MEK, and Hexane in accordance with the Division's Air Toxics/Hazardous Air Pollutant Permitting Procedure. The facility submitted Screen3 modeling to the Department.

A. The modeled emission rates are based on the following:

Modeled HAP emission rates for Toluene, MEK, and Hexane were based on the facility wide monthly VOC limit, Leased Space Monthly VOC limit, and Service Center Annual VOC Limit. The assumption was made that 100% of VOCs is either Toluene, MEK, or Hexane.

This gives 25.8 lb/hr each for toluene, MEK, and Hexane from Goodrich Existing(ID # A-G in Appendix A of the Permit). The modeled emission rate from Goodrich Existing was based on what is left over after Goodrich Leased and the Service Center emission rates are subtracted from the facility-wide number. The emission rate converted to grams/s (g/s) is 3.2 g/s. The emission rates from Goodrich Leased and the Service Center would be 6.2 lb/hr (.78 g/s). These emissions are based on 8760 hrs/yr . It is appropriate to assume 8760 hrs/yr because emissions will occur around the clock as the product cures. The facility starts chemical mixing at 4 am. Ovens run from 11 pm - 3am.

B. Screen3 cannot model multiple stacks but can be used for a conservative estimate. Guidance indicates it can be assumed that all emissions come from the worst case stack. Guidance also indicates that stacks need to be sufficiently similar. Section 2.2 of EPA's Screening Procedures for Estimating the Air Quality Impact of Stationary Sources, Revised indicates that if certain parameters, one of which is volumetric flow rate, differs by > 20%, the resulting estimated concentrations may be "unacceptably high". Goodrich does have stacks that are sufficiently dissimilar. Therefore only those multiple stacks with the similar or same stack characteristics were assumed to vent from one stack. For example the 11 ventilation stacks are asssumed to vent from one, the 2 paint booth stacks are assumed to vent from one, and 2 out of 3 storeroom stacks are assumed to vent from one. 89.87 % of the existing facility emissions are assumed to be emitted from the ventilation stacks, 8.72% from the paint booth stacks, 0.9 % from the two similar store room stacks, and .45% from the remaining store room stack. The stacks from the ventilation stacks, paint booth , 2 store room stacks, and remaining store room stack were added together. Stacks at Goodrich Existing were modeled as point sources with the exception of one of the three (3) stacks in the store room. This store room stack was modeled as an area and a volume source because it has a mushroom-style rain cover. The volume model predicted the higher concentration and so was used in the above described calculation.

C. The resulting modeled concentration from Goodrich Leased was added to the modeled concentration from Goodrich Existing. Goodrich Leased was modeled as

an Area and Volume Source and the model predicting the highest concentration was used for comparison with the Arizona Ambient Air Quality Guidelines (AAAQGs). Goodrich Leased is not a point source because it has no forced ventilation or stacks. The above procedure was deemed acceptable based upon a discussion with EPA.

D. Assumed emission rate of 1 g/s for the Volume and Point Source models. Used 1 g/m^{2}s for the Area Source model. The maximum concentration was then multiplied by the appropriate emission rate.

Area Source Modeling Analysis for Goodrich Leased and Service Center

Pollutant	CAS NO.	Emission Rate (lb/hr)	Maximum Concentration 1 hour (ug/m^3)	Maximum Concentration 24 hour (ug/m^3)
Toluene	101883	6.2	1229	491
MEK	78933	6.2	1229	491
Hexane	110543	6.2	1229	491

Volume Source Modeling Analysis for Goodrich Leased and Service Center

Pollutant	CAS NO.	Emission Rate (lb/hr)	Maximum Concentration 1 hour (ug/m^3)	Maximum Concentration 24 hour (ug/m^3)
Toluene	101883	6.2	**2468**	**987**
MEK	78933	6.2	**2468**	**987**
Hexane	110543	6.2	**2468**	**987**

Modeling Analysis for Goodrich Existing (Point Sources , 1 Area and Volume Source

Pollutant	Emission Rate Lb/hr	Ventilation Stacks 89.87% of emissions		Paint Booth Stacks 8.72% of emissions		Store Room Stacks (2) 0.9% of emissions		*1 Store Room Stack Volume model .45% of emissions		1 Store Room Stack Area model .45% of emissions	
		1 hr	24 hour	1 hr	24 hr	1 hr	24 hr	**1 hr**	**24 hr**	1 hr	24 hr
Toluene	25.8	1206	482	150	60	59.2	23.7	**18.2**	**7.3**	13.6	5.4
MEK	25.8	1206	482	150	60	59.2	23.7	**18.2**	**7.3**	13.6	5.4
Hexane	25.8	1206	482	150	60	59.2	23.7	**18.2**	**7.3**	13.6	5.4

* One of the facility's 3 storeroom stacks was modeled as an Area and a Volume source with the highest concentration used. 2 of the storeroom stacks were modeled as point sources.

1206+150+59.2+18.2 = 1433

Facility-wide Maximum Predicted Concentrations						
Pollutant	CAS NO.	Maximum Concentration 1 hour (ug/m^3)	Maximum Concentration 24 hour (ug/m^3)	AAAQG 1-hour (ug/m^3)	AAAQG 24 hour (ug/m^3)	Under the AAAQGS?
Toluene	101883	3901	1560	4400	3000	Yes
MEK	78933	3901	1560	7400	4700	Yes
Hexane	110543	3901	1560	5400	1400	No
Hexane*	110543	357	143	5400	1400	Yes

2468+1433= 3901

***** Hexane for this model was assumed to account for 9.16% of VOCs based on the 2001 Emission Inventory and Toxic Release Inventory.